

# Appendix C

APPENDIX C

BACKGROUND DOCUMENTS

ITT-HARPER FACILITY  
ILD 005 211 545

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
NAME OF INSTALLATION	
INSTALLATION ADDRESS	
LOCATION OF INSTALLATION	

PLEASE PLACE LABEL ON SHIPPER'S BOX

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84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11/17/11

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 1 0	F 0 1 1	F 0 1 2		
21	22	23	24	25	26
7	8	9	10	11	12
21	22	23	24	25	26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 6 1	K 0 6 3				
21	22	23	24	25	26
19	20	21	22	23	24
21	22	23	24	25	26
25	26	27	28	29	30
21	22	23	24	25	26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
21	22	23	24	25	26
37	38	39	40	41	42
21	22	23	24	25	26
43	44	45	46	47	48
21	22	23	24	25	26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospital, veterinary hospital, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
21	22	23	24	25	26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)☐ 2. CORROSIVE  
(D002)☐ 3. REACTIVE  
(D003)☐ 4. TOXIC  
(D004)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME &amp; OFFICIAL TITLE (type or print)

DATE SIGNED

H. L. Williamson

H. L. Williamson, President

8/1/80



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA  
I.D. NO.

I. NAME OF INSTALLATION

II. MAILING  
ADDRESSLOCATION  
OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

*waste*  
*corrected*  
*added*  
*3-5*

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a facility where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (Yr., Mo., &amp; Day)

## I. NAME OF INSTALLATION

I T T H A R P E R A D I V I S I O N O F I T T

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 8 2 0 0 L E H I G H A V E

CITY OR TOWN

ST. ZIP CODE

4 M O R T O N G R O V E

I L 6 0 0 5 3

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 8 2 0 0 L E H I G H A V E

CITY OR TOWN

ST. ZIP CODE

6 M O R T O N G R O V E

I L 6 0 0 5 3

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

2 M I L O T I M O T H Y P L A N T E N G I N E E R

3 1 2 9 6 6 6 0 0 0

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 I T T H A R P E R A D I V I S I O N O F I T T

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F - FEDERAL  
M - NON-FEDERAL☒ A. GENERATION  
☒ C. TREAT/STORE/DISPOSE☐ B. TRANSPORTATION (complete item VII)  
☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR ☐ B. RAIL ☐ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I L D 0 0 5 2 1 1 5 4 5

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 1 0	F 0 1 1	F 0 1 2		
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 6 1	K 0 6 2	K 0 6 3			
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☒ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D004)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME &amp; OFFICIAL TITLE (Type or Print)

E. T. Vogel - President

DATE SIGNED

11-17-80





ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD005211545

REACKNOWLEDGEMENT

INSTALLATION ADDRESS

ITT HARPER  
8200 LEHIGH AVE  
MORTON GROVE

IL 60053

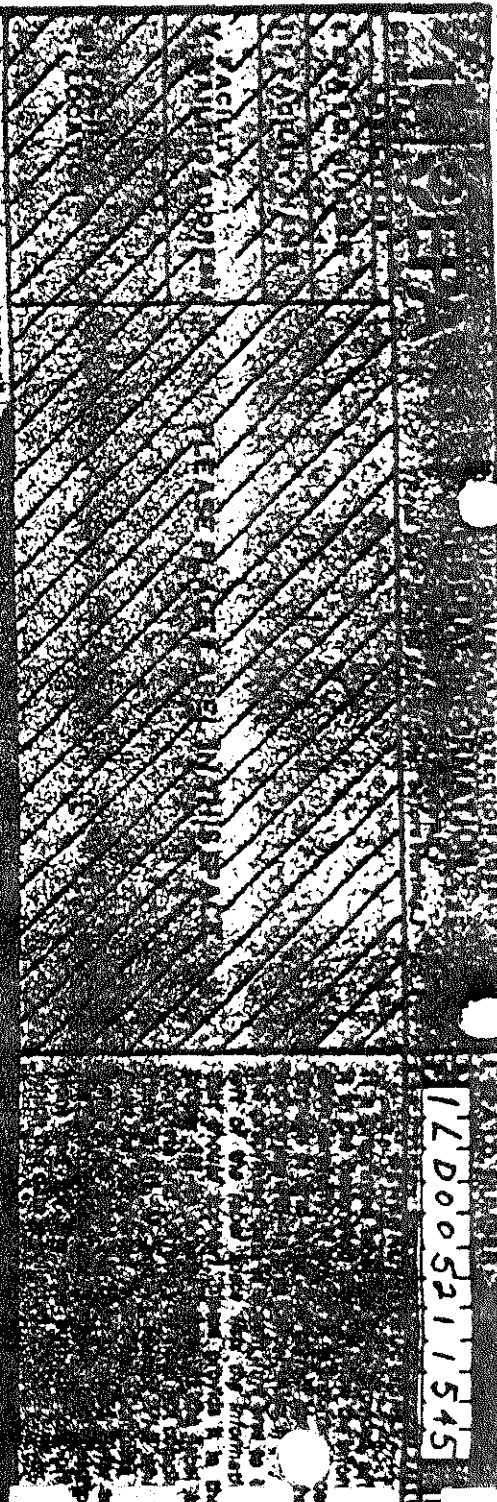
8200 LEHIGH AVE  
MORTON GROVE

IL 60053

09/28/81



44-1-1



**H. POLLUTANT CHARACTERISTICS**

1. Do you or will you inject or discharge any pollutant into the environment (including the ground, surface water, or air) in the course of the normal operation of the facility? ☒ Yes ☐ No

2. If you or will you inject or discharge any pollutant into the environment, is the pollutant listed in the following table? ☒ Yes ☐ No

3. If you or will you inject or discharge any pollutant into the environment, is the pollutant listed in the following table? ☒ Yes ☐ No

4. If you or will you inject or discharge any pollutant into the environment, is the pollutant listed in the following table? ☒ Yes ☐ No

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100

**HL NAME OF FACILITY**

1. Name of facility: I T T H A R P E R A D I V I S I O N O F I T T

**IV. FACILITY CONTACT**

1. Name and title (last, first, & middle): M I L O T I M O T H Y P L A N T E N G I N E E R

2. Phone (area code & number): 3 1 2 9 6 6 6 0 0 0

**V. FACILITY MAILING ADDRESS**

1. Street or P.O. box: 8 2 0 0 L E H I G H A V E

2. City or town: M O R T O N G R O V E

3. State & ZIP code: I L 6 0 0 5 3

4. Facility location: 8 2 0 0 L E H I G H A V E

5. Facility location: C O O K

6. Facility location: M O R T O N G R O V E

7. Facility location: I L 6 0 0 5 3

8. Facility location: 0 3 1

9. Facility location: M O R T O N G R O V E

10. Facility location: I L 6 0 0 5 3

VI. MC CODES (adapt in order of priority)

A. FIRST

3 4 5 2 (specify) BOLTS, NUTS, ETC.

3 3 9 9 (specify)

PRIMARY METAL PRODUCTS

3 3 1 7 (specify) STEEL PIPES &amp; TUBES

3 4 5 1 (specify)

SCREEN MACHINE PRODUCTS

## V. OPERATOR INFORMATION

A. NAME

T T HARPER A DIVISION OF ITT

B. STATE OF OPERATOR (Enter the appropriate letter into the answer box: V=Other, specify)

STATE OF OHIO (specify)

P (specify) PRIVATE

3 1 2 9 6 6 6 0 0 0

8 2 0 0 LEHIGH AVE

C. CITY OR TOWN

MORTON GROVE

STATE OF OHIO (specify)

3 1 2 9 6 6 6 0 0 0

## X. EXISTING ENVIRONMENTAL PERMITS

A. APDES (Discharges to Surface Water)

I L 0 0 3 4 8 5 1

B. PSD (Air Emissions from Proposed Sources)

I L 0 0 3 4 8 5 1

B. type (Underground Injection of Fluids)

U NONE

E. OTHER (specify)

(specify) \* SEE ATTACHMENT B

C. RCRA (Hazardous Waste)

R NONE

E. OTHER (specify)

(specify) \* SEE ATTACHMENT B

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond its property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its buildings, tanks, treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## II. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE FASTENERS, AND EXTRUDED SHAPES

## XIII. CERTIFICATION (see instructions)

I, E. T. Vogel - President, declare under penalty of law that I have personally examined and am familiar with the information contained in this application and the facts stated herein. Based on my inquiry of those persons immediately responsible for the accuracy of the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME &amp; OFFICIAL TITLE (Type or print)

B. SIGNATURE

C. DATE SIGNED

E. T. Vogel - President

ET Vogel

11-17-80

## COMMENTS FOR OFFICIAL USE ONLY



**III. PROCESSES (continued)**  
 SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (Code "T04"). FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristic and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	MA

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking it account the appropriate density or specific gravity of the waste.

**D. PROCESSES**

**1. PROCESSES**  
 For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.  
 For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 800 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

M Z Z	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESSES (enter)			D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03	D80		
X-2	D002	400	P	T03	D80		
X-3	D001	100	P	T03	D80		
X-4	D002						included with above

EPA I.D. NUMBER (enter from page 1)

W 1 L D C C 5 2 1 1 5 4 5

FOR OFFICIAL USE ONLY

DUP

2 DUP

## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO. JZ	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS. SURE (enter code)	1. PROCESS CODES				D. PROCESSES  (if a code is not entered in D(1))					
				T	S	O	1						
1	K 0 6 2	300,000	T	T	O	1	S	O	2	S	O	4	Included w/above
2	D 0 0 0												Included w/above
3	D 0 0 2												Included w/above
4	F 0 1 0												Included w/above
5	F 0 1 1												Included w/above
6	K 0 6 3	1,250	T			S	O	2					
7	K 0 6 1	30	T			S	O	1					
8	F 0 1 2												Included w/above
9	F 0 0 1	60	T			S	O	1					
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													
21													
22													
23													
24													
25													
26													

EPA I.D. NO. (enter from page 1)											
5	4	3	2	1	0	9	8	7	6	5	4
F	I	D	0	0	5	2	1	1	5	4	5
										7	A
										6	C

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degree, minutes, & seconds)												LONGITUDE (degree, minutes, & seconds)											
4	2	0	2	3	0	N						0	8	7	4	6	0	2	W				
45	40	45	40	45	40	45						72	45	72	45	72	45	72	45				

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER												2. PHONE NO. (area code & no.)											
3. STREET OR P.O. BOX												4. CITY OR TOWN											
5. ST.												6. ZIP CODE											

IX. OWNER CERTIFICATION

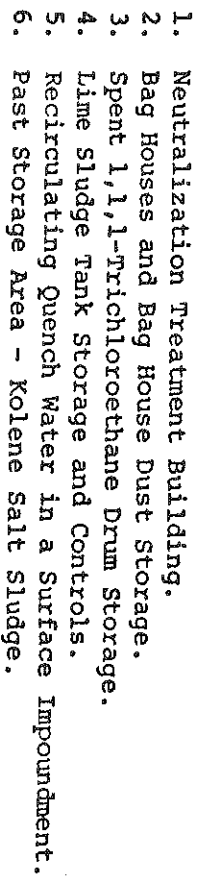
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. T. Vogel	E. T. Vogel	11-17-80

X. OPERATOR CERTIFICATION

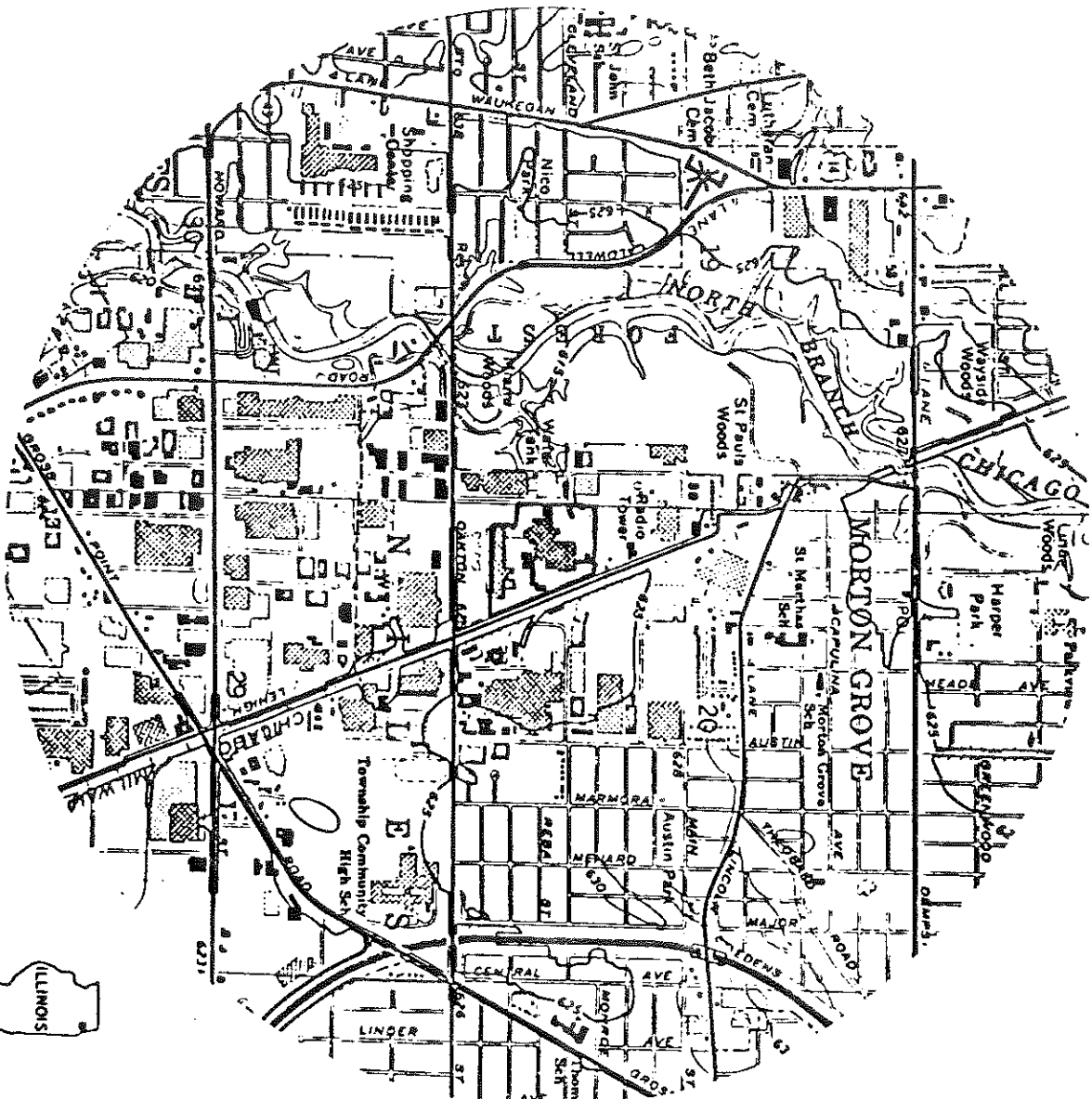
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. T. Vogel	E. T. Vogel	11-17-80

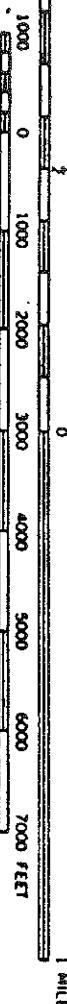


SCALE =  $\frac{1}{2}$ " = 100'

030



SCALE 1:24,000



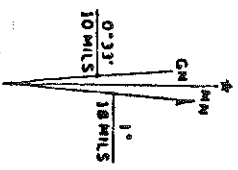
CONTOUR INTERVAL 5 FEET  
DATUM IS MEAN SEA LEVEL

QUADRANGLE LOCATION



Notes:

1. 001 indicates a storm water and non-contact cooling water outfall per NPDES Permit #IL0034851 which empties into the North Branch of the Chicago River.
2. The North Branch of the Chicago River flows to the South.
3. Location of ITT Harper to nearest second is  $42^{\circ} 02' 30''$  N,  $87^{\circ} 46' 02''$  W.
4. A copy of page 5 from Part 3 of this application is attached to better illustrate the exact locations of each hazardous waste Management Facility.



VIEW GRID AND 1972 MAGNETIC NORTH  
DEFINITION OF GRID AND MAGNETIC NORTH

TAKEN FROM  
PARK RIDGE, ILL.

N4200-W8745/7.5

1963  
PHO. REVISED 1972  
AM 1111 ERIE 13

ATTACHMENT A

Illinois NPDES Permit #ILO034851

Effective Date: August 16, 1980  
Expiration Date: May 1, 1985

During a phone conversation with Mr. Cho of the US EPA region V office in Chicago, Mr. Cho confirmed that since the above mentioned NPDES permit had just recently been renewed for a term of 5 years, it was not necessary to file Form 2C as part of this application. Instead, this note and a copy of the current NPDES Permit are attached.

10/1/80

NPDES Permit No. IL0034851

Illinois Environmental Protection Agency

Division of Water Pollution Control

2200 Churchill Road

Springfield, Illinois 62706

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date:

May 1, 1985

Issue Date: July 16, 1980

Effective Date: Aug. 16, 1980

Permittee:

ITT Harper, A Division of International  
Telephone and Telegraph Corp.

Facility Name and Address:

ITT Harper, A Division of International  
Telephone & Telegraph Corp., 8200 Lehigh  
Avenue, Norton Grove, Illinois 60053,  
Cook County

Receiving Waters:

The North Branch of the Chicago River

In compliance with the provisions of the Illinois Environmental Protection Act, the Chapter 3 Rules and Regulations of the Illinois Pollution Control Board, and the FWPCA, the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

*07 6/11/85*  
Thomas G. McSwiggin, P.E.  
Manager, Permit Section  
Division of Water Pollution Control

TGM:LME:YVS:dkr:sp/3149b

NPDES Permit No. IL0034851

ATTACHMENT B

Effluent Limitations and Monitoring

Discharge Number(s): 001

Discharge Name(s): Noncontact Cooling Water and Stormwater

For an effective date of permit until the expiration date of the Permit, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

PARAMETER	CONCENTRATION LIMITS mg/l			LOAD LIMITS lbs/day (Kg/day)			SAMPLE FREQUENCY IF DISCHARGE OCCURS	SAMPLE TYPE
	30 DAY AVG.	7 DAY AVG.	DAILY MAX.	30 DAY AVG.	7 DAY AVG.	DAILY MAX.		

Flow (MGD)	See Attachment B Continued						1/Month	Grab
Temperature	See Attachment B Continued						1/Month	Grab
Oil, Fats & Grease	15		30				1/Month	Grab

NPDES Permit No. 1L0034851

ATTACHMENT 8 CONTINUED

1. The pH shall be in the range 6.0 to 9.0.
2. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.
3. For the purpose of this permit this discharge is limited solely to noncontact cooling water and stormwater free from any other waste water discharges.
4. The permittee shall record monitoring results on Discharge Monitoring Report Forms using one such form for each discharge each month.  
Discharge Monitoring Reports shall be mailed to the IEPA at the following address:  
Illinois Environmental Protection Agency  
Division of Water Pollution Control  
2200 Churchill Road  
Springfield, Illinois 62706  
Attention: NPDES Unit (DNR)
5. The completed Discharge Monitoring Report forms shall be retained by the permittee for a period of six months and then shall be mailed and received by the IEPA in accordance with the following schedule, unless otherwise specified by the permitting authority.

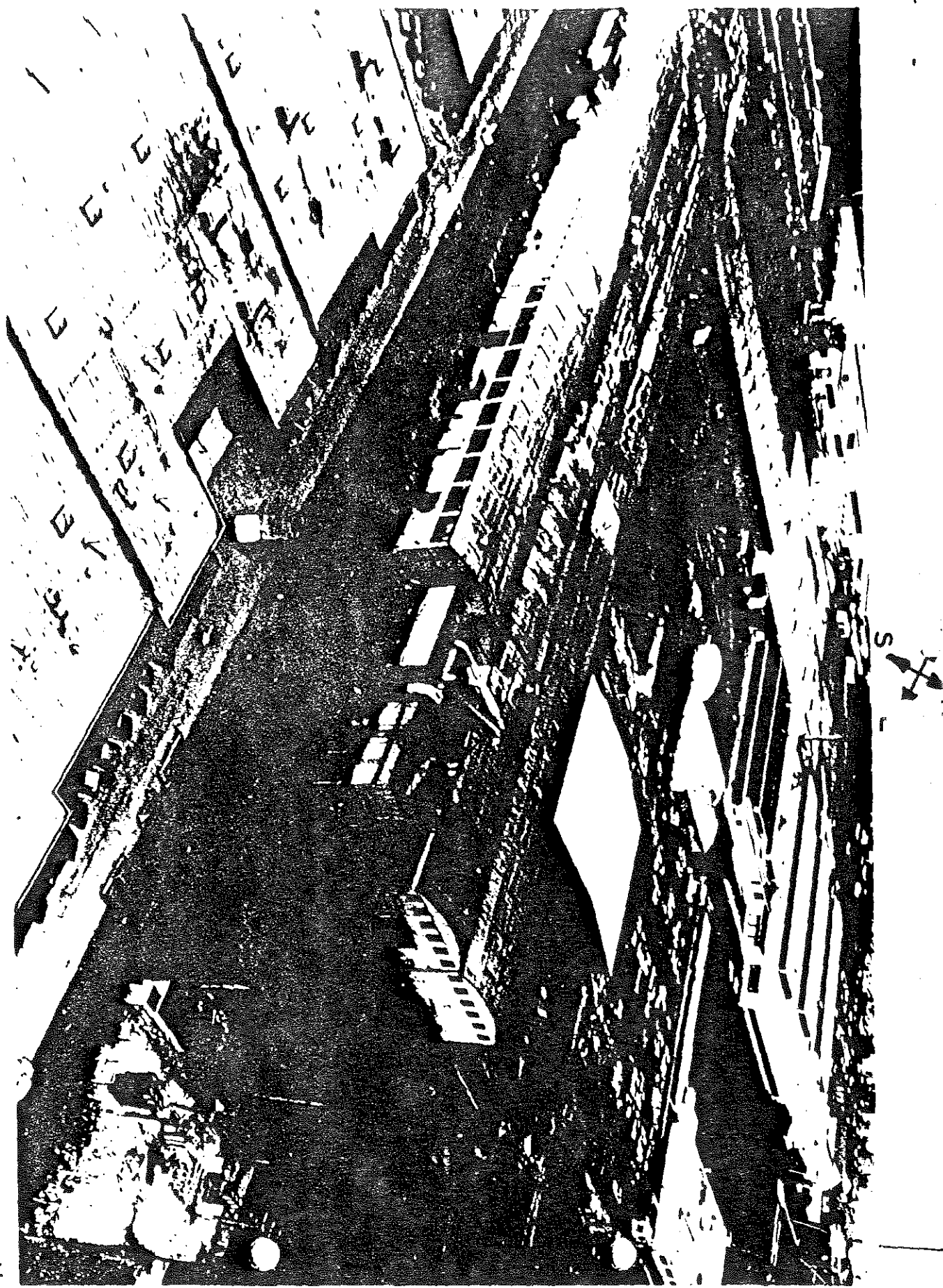
*Compliance Assurance Clerk*  
*original & one copy -*

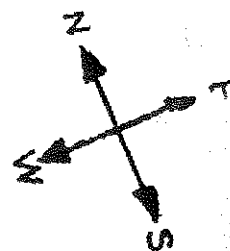
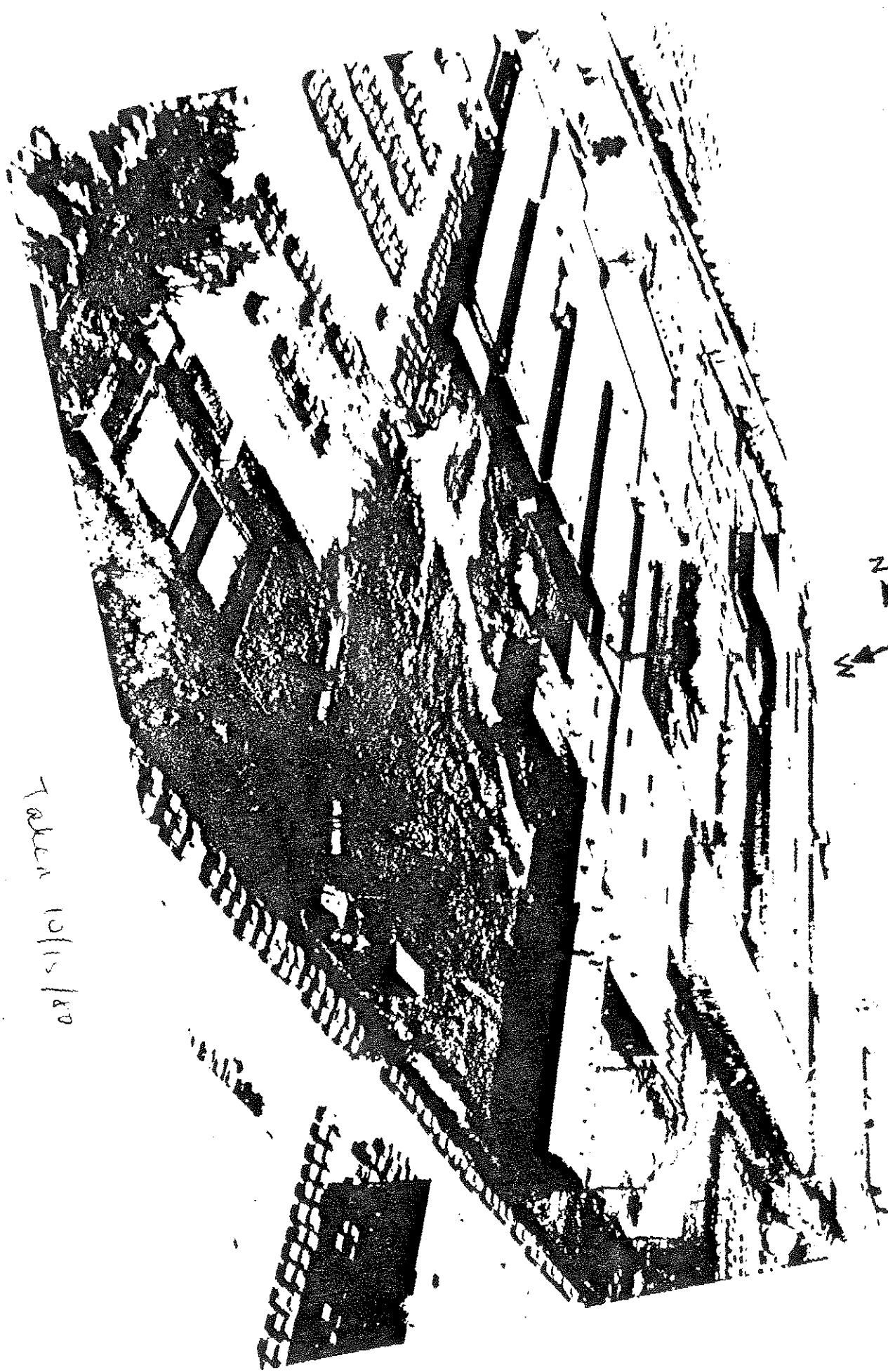
Period

Received by IEPA

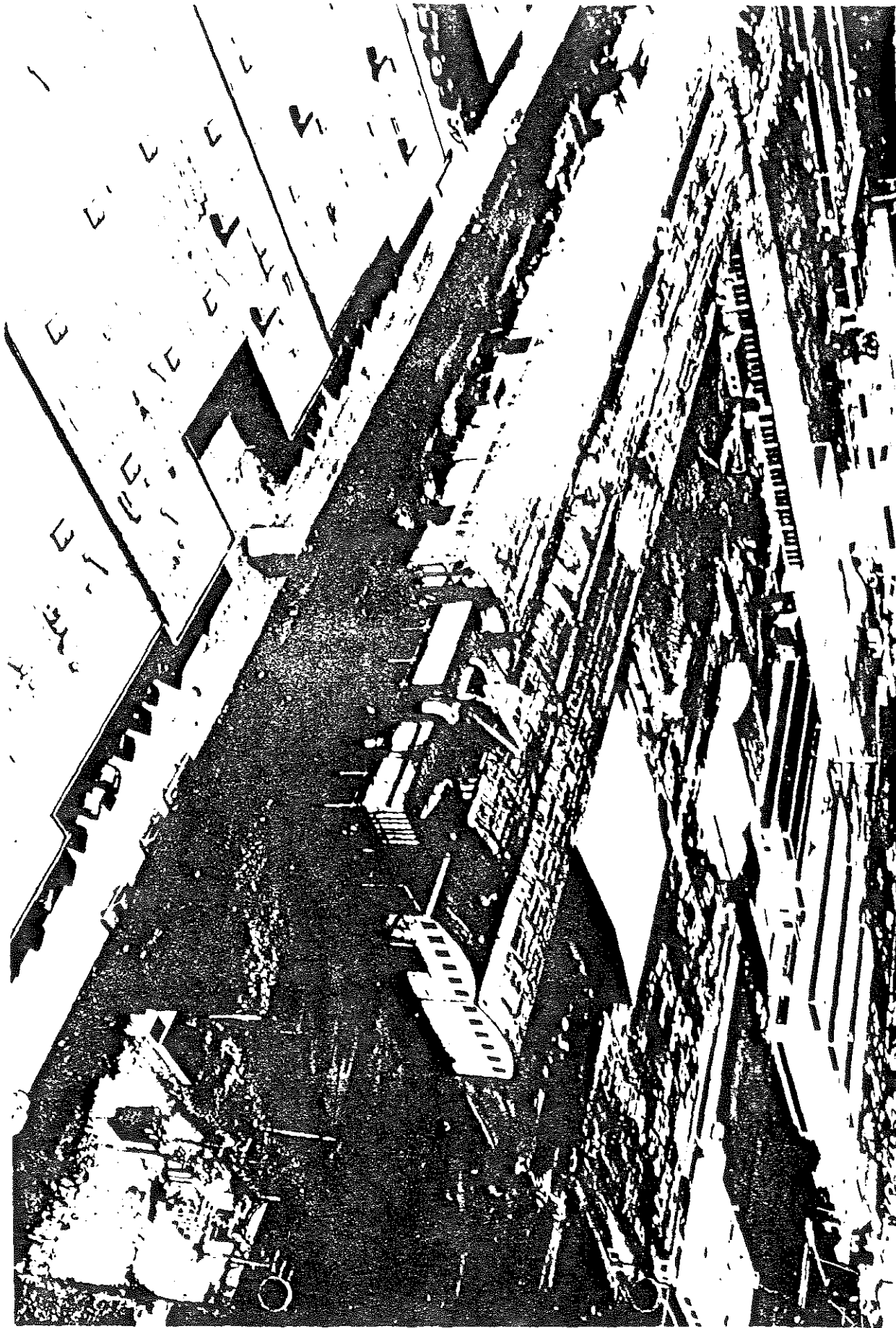
March, April, May, June, July, August	September 15
September, October, November, December, January, February	March 15

349





Taken 10/15/80



Taken 12/15/80

343





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

REGION V  
111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

Mr. Timothy Milo, Plant Engineer  
ITT Harper, a Div. of ITT  
8200 Lehigh Ave.  
Morton Grove, Illinois 60053

RE: Interim Status Acknowledgement

USEPA ID No. IL D005211545

FACILITY NAME: ITT Harper a Division of ITT

Dear Mr. Milo:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Illinois has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in 35 Illinois Administrative Code, Subtitle G, Chapter I, Subchapter c, Part 725, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Illinois Environmental Protection Agency for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

If you have questions concerning the Illinois hazardous waste regulations, please contact Mr. Robert Kuykendall at the Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. His phone number is (217) 782-6760.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: E. T. Vogel, President



PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

This form is to be completed by you and submitted to the EPA. If you answer "yes" to any question, you must complete the form and the Supplemental Form (if applicable) in the parentheses following the question. Mark "X" in the box in the right column. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is not a regulated activity, or if the facility is not a regulated facility. See also, Section D of the instructions for definitions of regulated activity.

QUESTION	MARK "X" IF YES	
	YES	NO
1. Is this a regulated activity currently results in discharges of air pollutants other than those described in 40 CFR Part 261 (FORM 201)?	X	
2. Does your facility treat, store, or dispose of hazardous wastes? (FORM 31)	X	
3. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface by the well, or with conventional oil or natural gas production, for enhanced recovery of oil or gas? (FORM 41)	X	
4. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the Instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)	X	
5. Does or will this facility (either existing or proposed) include a combustion unit which results in a discharge to waters of the U.S.? (FORM 201)	X	
6. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 201)	X	
7. Do you or will you inject at this facility industrial or municipal effluent below the basement stream containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	X	
8. Do you or will you inject at this facility fluids for special processes such as mining or sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	X	
9. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the Instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)	X	

III. NAME OF FACILITY

ITT HARPER A DIVISION OF ITT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)  
 MILLO TIMOTHY PLANT ENGINEER  
 B. PHONE (area code & no.)  
 312 966 6000

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX  
 8200 LEHIGH AVE  
 B. CITY OR TOWN  
 MORTON GROVE  
 C. STATE  
 IL  
 D. ZIP CODE  
 60053

VI. FACILITY LOCATION

A. STATE ROUTE NO. OR OTHER SPECIFIC IDENTIFIER  
 8200 LEHIGH AVE  
 B. COUNTY NAME  
 COOK

A. CITY OR TOWN  
 MORTON GROVE  
 B. STATE  
 IL  
 C. ZIP CODE  
 60053

3 4 5 2

Bolts, Nuts, etc.

3 3 3 9

(specify)

Primary Metal Products

3 3 1 7

Steel Pipes &amp; Tubes

3 4 9 1

(specify)

Screw Machine Products

## OPERATOR INFORMATION

A. NAME

ITT HARPER A DIVISION OF ITT

B. PHONE (Area Code &amp; No.)

3 1 2 9 6 6 6 0 0 0

C. ADDRESS (Enter the appropriate letter into the answer box: if "Other," specify.)

D. PHONE (Area Code &amp; No.)

200 LEHIGH AVE

MORTON GROVE

STATE N. ZIP CODE

IL 6 0 0 5 3

MORTON GROVE

STATE N. ZIP CODE

IL 6 0 0 5 3

## EXISTING ENVIRONMENTAL PERMITS

A. PERMIT (Discharges to Surface Water)

B. PERMIT (Air Emissions from Proposed Sources)

C. PERMIT (Discharges to Groundwater)

D. OTHER (specify)

E. OTHER (specify)

F. OTHER (specify)

G. OTHER (specify)

H. OTHER (specify)

I. OTHER (specify)

J. OTHER (specify)

K. OTHER (specify)

L. OTHER (specify)

M. OTHER (specify)

N. OTHER (specify)

O. OTHER (specify)

P. OTHER (specify)

Q. OTHER (specify)

R. OTHER (specify)

S. OTHER (specify)

T. OTHER (specify)

U. OTHER (specify)

V. OTHER (specify)

W. OTHER (specify)

X. OTHER (specify)

Y. OTHER (specify)

Z. OTHER (specify)

## XII. NATURE OF BUSINESS (provide a brief description)

Attached to this application is a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## MANUFACTURE FASTENERS, AND EXTRUDED SHAPES

## III. CERTIFICATION (see instructions)

I, the undersigned, certify that I am personally acquainted with the information submitted to this application and that I am a responsible person in the business and that those persons immediately responsible for obtaining the information submitted to this application are reliable. I declare that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME &amp; OFFICIAL TITLE (Type or print)

B. SIGNATURE

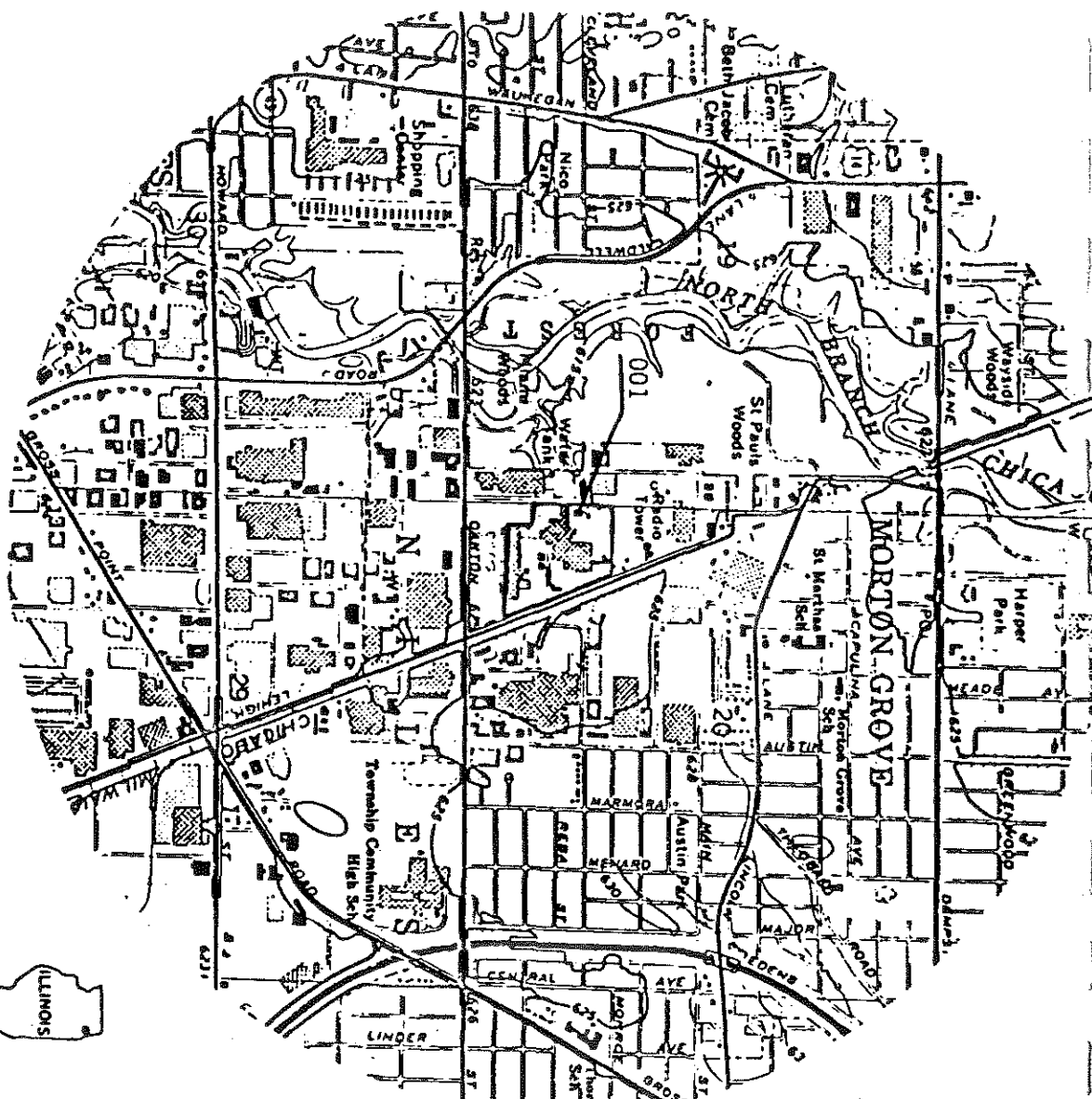
C. DATE SIGNED

E.T. Vogel

E Thomas Vogel

5/18/81

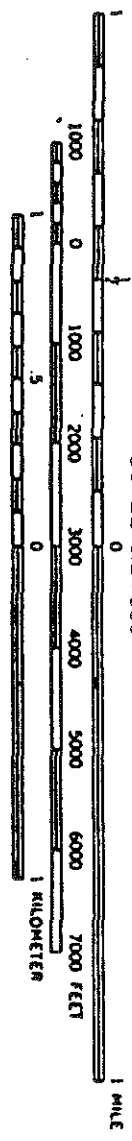
## AGENT FOR OFFICIAL USE ONLY



QUADRANGLE LOCATION



SCALE 1:24,000

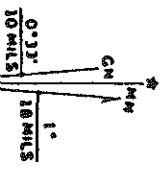


CONTOUR INTERVAL 5 FEET

DATUM IS MEAN SEA LEVEL

Notes:

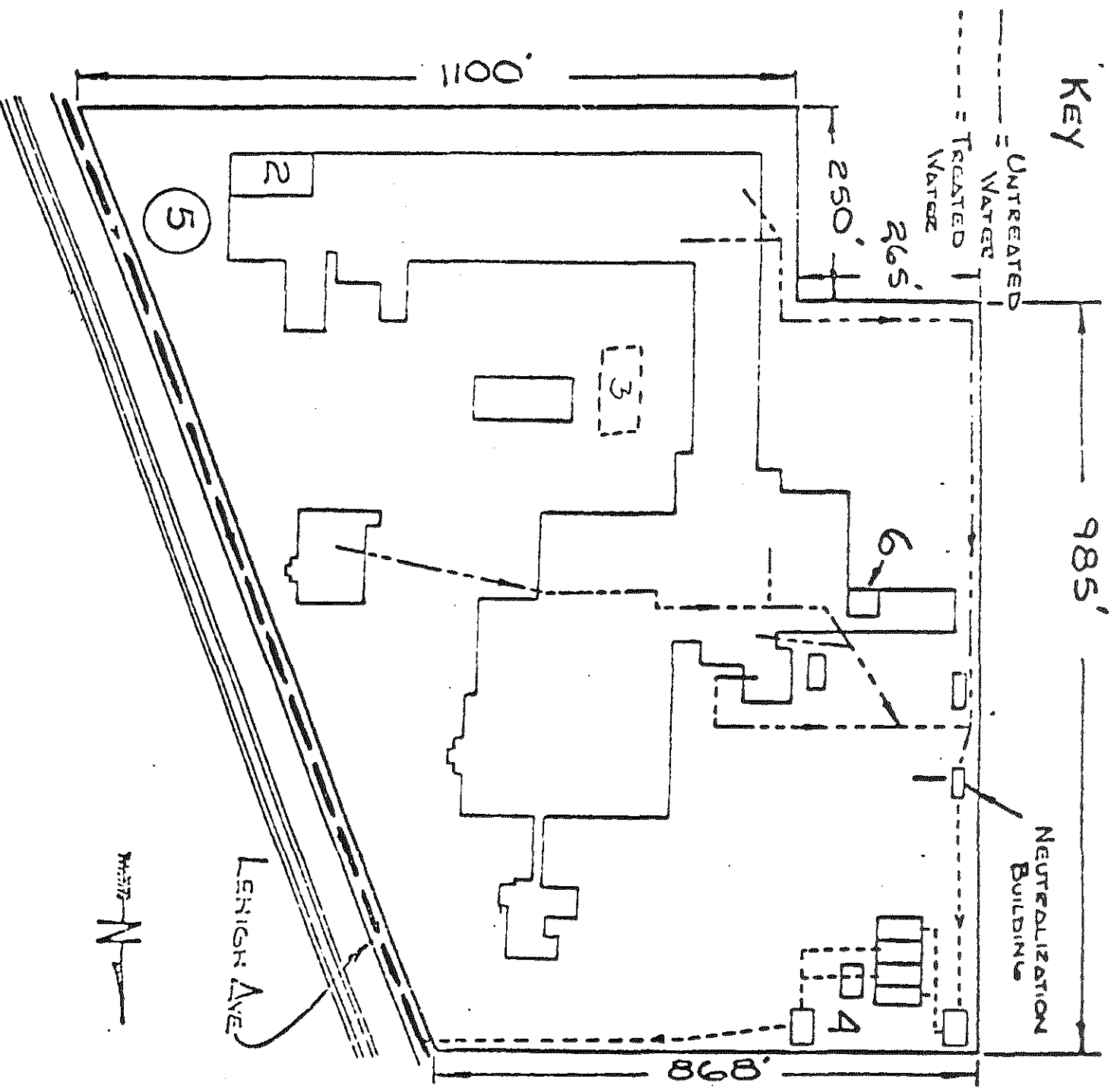
1. 001 indicates a storm water and non-contact cooling water outfall per NPDES Permit #110034851 which empties into the North Branch of the Chicago River.
2. The North Branch of the Chicago River flows to the South.
3. Location of ITT Harper to nearest second is  $42^{\circ} 02' 30''$  N,  $87^{\circ} 46' 02''$  W.
4. A copy of page 5 from Part 3 of this application is attached to better illustrate the exact locations of each hazardous waste Management Facility.



UTM GRID AND 1972 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

TAKEN FROM  
PARK RIDGE, ILL.  
N4200-W8745/7.5

1963  
PHOTOREVISED 1972  
AMS 3468 III SE-SERIES V883



1. Neutralization Treatment Building.
2. Bag Houses and Bag House Dust Storage.
3. Spent 1,1,1-Trichloroethane Drum Storage.
4. Lime Sludge Tank Storage and Controls.
5. Recirculating Quench Water in a Surface Impoundment.
6. Past Storage Area - Kolene Salt Sludge.

----- Industrial Wastewater Sewer System

- - - - - Chicago Metropolitan Sanitary District Sewer System

SCALE =  $\frac{1}{2}$ " = 100'

NOTE: UPON CLOSURE AREA 5 WILL BECOME A PAST STORAGE AREA.

10/31/80

DMC

ATTACHMENT A

Illinois NPDES Permit #110034851

Effective Date: August 16, 1980

Expiration Date: May 1, 1985

During a phone conversation with Mr. Cho of the US EPA region V office in Chicago, Mr. Cho confirmed that since the above mentioned NPDES permit had just recently been renewed for a term of 5 years, it was not necessary to file Form 2C as part of this application. Instead, this note and a copy of the current NPDES Permit are attached.

10/1/80

NPDES Permit No. IL0034851

Illinois Environmental Protection Agency

Division of Water Pollution Control

2200 Churchill Road

Springfield, Illinois 62706

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date:

May 1, 1985

Issue Date: July 16, 1980  
Effective Date: Aug. 16, 1980

Permittee:

ITT Harper, A Division of International  
Telephone and Telegraph Corp.

Facility Name and Address:

ITT Harper, A Division of International  
Telephone & Telegraph Corp., 8200 LeHigh  
Avenue, Morton Grove, Illinois 60053,  
Cook County

Receiving Waters:

The North Branch of the Chicago River

In compliance with the provisions of the Illinois Environmental Protection Act, the Chapter 3 Rules and Regulations of the Illinois Pollution Control Board, and the FWPCA, the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

*Thomas G. McSwiggin*  
Thomas G. McSwiggin, P.E.  
Manager, Permit Section  
Division of Water Pollution Control

TGM:LME:YVS:dkr:sp/3149b

NPDES Permit No. IL0034851

Effluent Limitations and Monitoring

Discharge Number(s): 001

Discharge Name(s): Noncontact Cooling Water and Stormwater

From effective date of permit until the expiration date of the Permit, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

PARAMETER	CONCENTRATION LIMITS mg/l			LOAD LIMITS lbs/day (Kg/day)			SAMPLE FREQUENCY IF DISCHARGE OCCURS	SAMPLE TYPE
	30 DAY AVG.	7 DAY AVG.	DAILY MAX.	30 DAY AVG.	7 DAY AVG.	DAILY MAX.		

Flow (MGD) Measure When Monitor

1	See Attachment B Continued	1/Month	Grab
Temperature	See Attachment B Continued	1/Month	Grab
Oil, Fats & Grease	15 30	1/Month	Grab

NPDES Permit No. 1L0034851

1. The pH shall be in the range 6.0 to 9.0.
2. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.
3. For the purpose of this permit this discharge is limited solely to noncontact cooling water and stormwater free from any other waste water discharges.
4. The permittee shall record monitoring results on Discharge Monitoring Report Forms using one such form for each discharge each month.  
Discharge Monitoring Reports shall be mailed to the IEPA at the following address:  
Illinois Environmental Protection Agency  
Division of Water Pollution Control  
2200 Churchill Road  
Springfield, Illinois 62706  
Attention: NPDES Unit (DMR)  
*Compliance Assessment Unit*  
*Original & one copy -*
5. The completed Discharge Monitoring Report forms shall be retained by the permittee for a period of six months and then shall be mailed and received by the IEPA in accordance with the following schedule, unless otherwise specified by the permitting authority.

Period	Received by IEPA
March, April, May, June, July, August	September 15
September, October, November, December, January, February	March 15

ATTACHMENT B

Additional Environmental Permits

Illinois Special Waste Disposal Permits

- #9986686 - Hauling of Chlorinated Solvent for Reclaim
- #998263 - Hauling of Waste Oil for Reclaim
- #781452 - Hauling and Disposal of Stamping Parts Rinse
- #997603 - Same as #781452, but for Reclaim
- #781522 - Hauling and Disposal of Metal Hydroxide Sludge.

Air Permits

- Illinois EPA #02090095 - Entire Plant and Arc Furnaces
- Illinois EPA #72111515 - Preheat Furnace
- Illinois EPA #04100068 - Sauder Annealing Furnace
- Cook County #093215 - Entire Plant

10/1/80

## FOR OFFICIAL USE ONLY

APPLICATION DATE RECEIVED  
(Yr, Mo, & Day)

COMMENTS

## II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA ID Number, or if this is a revised application, enter your facility's EPA ID Number in Item I above.

A. FIRST APPLICATION (Place an "X" below and provide the appropriate data)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (Yr, Mo, & Day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (Use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE CONSTRUCTION BEGAN OR THE DATE OPERATION COMMENCED (Use the boxes to the left)

B. REVISED APPLICATION (Place an "X" below and complete Item I above)

☒ 3. FACILITY HAS INTERIM STATUS

## III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount.  
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that best describes the unit of measure used. Only the units of measure that are listed below should be used.

PRO- APPROPRIATE UNIT OF  
CESS MEASURE FOR PROCESS  
CODE DESIGN CAPACITY

PRO- APPROPRIATE UNIT OF  
CESS MEASURE FOR PROCESS  
CODE DESIGN CAPACITY

## Storage:

CONTAINER (barrel, drum, etc.) S01 GALLONS OR LITERS  
TANK S02 GALLONS OR LITERS  
WASTE PILE S03 CUBIC YARDS OR  
SURFACE IMPOUNDMENT S04 GALLONS OR LITERS

## Treatment:

TANK T01 GALLONS PER DAY OR  
SURFACE IMPOUNDMENT T02 LITERS PER DAY OR  
INCINERATOR T03 TONS PER HOUR OR  
METRIC TONS PER HOUR;  
GALLONS PER HOUR OR  
LITERS PER HOUR

## Disposal:

INJECTION WELL D75 GALLONS OR LITERS  
LANDFILL D80 ACRE-FEET (the volume that  
would cover one acre to a  
depth of one foot) OR  
HECTARE-METER  
LAND APPLICATION D81 GALLONS OR LITERS  
OCEAN DISPOSAL D82 GALLONS PER DAY OR  
SURFACE IMPOUNDMENT D83 GALLONS OR LITERS

OTHER (Use for physical, chemical,  
thermal or biological treatment  
processes not occurring in tanks,  
surface impoundments or inciner-  
ators. Describe the processes in  
the space provided; Item III-C.)  
T04 GALLONS PER DAY OR  
LITERS PER DAY  
T05 TONS PER HOUR OR  
METRIC TONS PER HOUR;  
GALLONS PER HOUR OR  
LITERS PER HOUR

UNIT OF MEASURE  
CODE

UNIT OF MEASURE  
CODE

UNIT OF MEASURE  
CODE

GALLONS.....G  
LITERS.....L  
CUBIC YARDS.....Y  
CUBIC METERS.....C  
GALLONS PER DAY.....U

LITERS PER DAY.....V  
TONS PER HOUR.....D  
METRIC TONS PER HOUR.....W  
GALLONS PER HOUR.....E  
LITERS PER HOUR.....M

ACRE-FEET.....A  
HECTARE-METER.....F  
ACRES.....P  
HECTARES.....S

EXAMPLE FOR COMPLETING ITEM III (shown in the numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

A. PROCESS CODE (from Item I above)		B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY		A. PROCESS CODE (from Item I above)		B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	
1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)
X-1 S 0 2	600	G		5							
X-2 T 0 3	20	E		6							
1 T 0 1	250,000			7							
2 S 0 1	50			8							
3 S 0 1	8,000			9							
4 S 0 2	200,000			10							

#### IV. DESCRIPTION OF HAZARDOUS WASTES

**A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number of each of these wastes. If you handle both listed and non-listed hazardous wastes, enter the four-digit number of each of these wastes. If you handle only non-listed hazardous wastes, enter the four-digit number of each of these wastes. If you handle only listed hazardous wastes, enter the four-digit number of each of these wastes.

**B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure before being entered into the appropriate design capacity or specific gravity of the waste.

#### D. PROCESSES

**1. PROCESS CODES:** For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous waste(s) that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the five number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

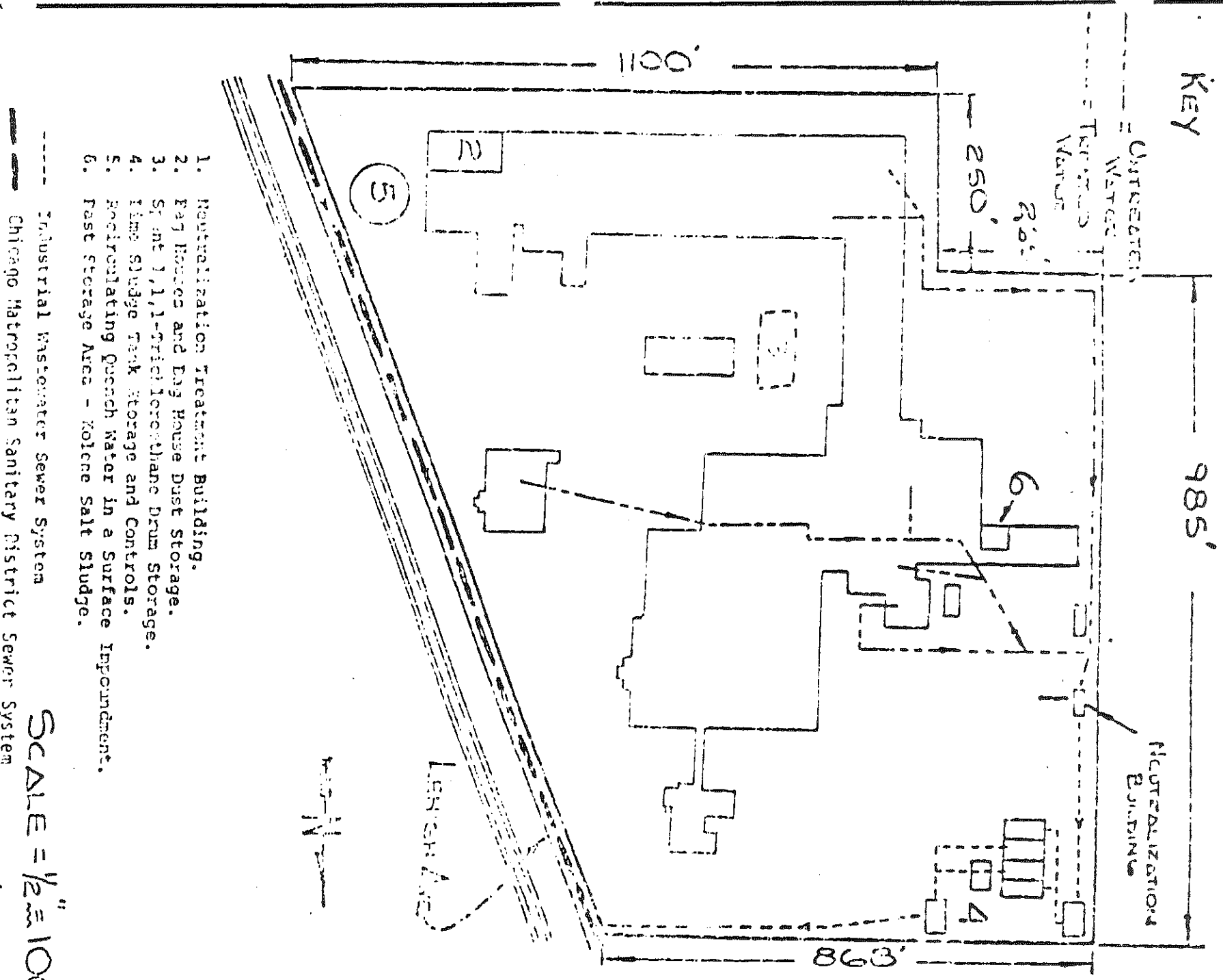
**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

EPA HAZARDOUS WASTE NO. (leather code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
			1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1 K 0 5 4	900	P	T 0 3 D 8 0	
X-2 D 0 0 2	400	P	T 0 3 D 8 0	
X-3 D 0 0 1	100	P	T 0 3 D 8 0	
X-4 D 0 0 2				Included with above

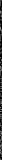
## V. FACILITY DRAWING (see page 4)



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DUK

三

EPA Form 3510-3 (6-80)

(enter "A", "B", "C", etc. behind the "j" to identify photocopied pages)

## \* ITEM VI - See Attachment C

EPA I.D. NO. (enter from page 1)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
5	1	L	D	0	0	5	2	1	1	5	4	5							

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	0	2	3	0	N
---	---	---	---	---	---	---

LONGITUDE (degrees, minutes, & seconds)

0	8	7	4	6	0	2	W
---	---	---	---	---	---	---	---

## VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
5. ST.										6. ZIP CODE									

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

E. T. Vogel

B. SIGNATURE

E Thomas Vogel

C. DATE SIGNED

5/18/81

## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

E. T. Vogel

B. SIGNATURE

E Thomas Vogel

C. DATE SIGNED

5/18/81

ATTACHMENT C

UPDATED PHOTOS OF THE SURFACE IMPOUNDMENT AREA AFTER CLOSURE,  
WILL BE FORWARDED UPON COMPLETION OF THE CLOSURE PLAN.



# ENVIRONMENTAL CONTROL MANUAL

**ITT Harper**  
  
A Division of  
International Telephone  
and Telegraph Corporation

## CLOSURE PLANS FOR SURFACE IMPOUNDMENT

- I. Upon making the decision to close the rolling mill cooling pond surface impoundment, the following actions will be taken.
  - A. Closure cost estimate will be reviewed.
  - B. A copy of the closure cost estimate and closure plans, and a revised RCRA permit application reflecting the closure will be forwarded to EPA at least 180 days prior to the intended closure date. A letter of intent stating the closure date shall accompany the above.
  - C. ITT Midwest legal shall be contacted to review and comment on the above documents prior to EPA submittal.
- II. Upon receipt of written approval from E.P.A., the surface impoundment will be closed; adhering to the following plan.
  - A. All standing liquid in the impoundment will be removed by pumping into Harpers industrial treatment system. The Q.C. Dept. will be notified so additional analyses of treated effluent can be made.
  - B. All underlying soil including the clay liner, will be removed to a depth where no contamination exists. Removed material will be disposed of in a secured landfill.
  - C. As all contaminated material will be removed from the surface impoundment, and all underlying soil will be excavated & disposed of, a leachate collection system, or ground water monitoring system is not necessary.
  - D. Excavated area will be backfilled and graded to prevent run-on or pooling.
  - E. As all hazardous constituents will be removed (per item C above), capping the area with an impervious membrane will not be required.
  - F. Site restoration will include topsoil layer, and sodding or seeding as required.
  - G. This area is located within Harpers perimeter fencing, therefore, additional security fencing is necessary.
  - H. As all contaminated material will be removed from the surface impoundment, and all underlying soil will be excavated and disposed of, and further since the impoundment is located totally within Harpers property lines, no financial liability is anticipated, and no post closure care is needed.

Revision	Effective Date	Authorization	Page



# ENVIRONMENTAL CONTROL MANUAL



ITT Harper

A Division of  
International Telephone  
and Telegraph Corporation

## CLOSURE COST ESTIMATE FOR SURFACE IMPOUNDMENT

### I. Lab Analysis

nonre

### II. Disposal of Standing Liquid & Sludge

- A. Labor (Maint. & Q.C.) =  hrs. @ /hr.  
B. Neutralizing Agents  
C. Sludge Disposal =  gal. sludge @ \$./gal.

nonres  
nonre  
nonres

### III. Disposal Underlying Soil & Liner

- A. Excavation Labor =  yards<sup>3</sup>  
B. Hauler Costs #  loads at  yds<sup>3</sup>/load X \$  
per trip  
C. Disposal Fees =  yards<sup>3</sup> X /yd.<sup>3</sup>

nonres  
nonres  
nonres

### IV. Site Restoration

- A. Backfill & Compact - Labor

nonres

### V. Professional Services

nonres

### VI. Contingencies

nonres

\$nonresp

Revision

Effective Date

Authorization

Page



ITT Harper 

A Division of  
International Telephone and Telegraph Corporation  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053  
(312) 966-6000 Telex 724464

May 18, 1981

Mr. David Kee  
USEPA - Director Waste Mgmt. Div.  
Region V - Waste Management Branch  
111 W. Jackson Blvd.  
Chicago, Ill. 60604

Dear Mr. Kee;

Per a previous telephone conversation with Tom Golz of your department, I am enclosing Harpers revised permit application which reflects our intention to close the surface impoundment identified as item 5 on the facilities description map. Also, enclosed, per EPA requirements, is a copy of Harpers' closure plan, and closure cost estimate for this project.

As discussed with Tom, Harper is now taking bids on a project to replace the impoundment with a conventional cooling tower system. Since this impoundment served only as a water storage pond for the existing cooling process, this is an easily accomplished change.

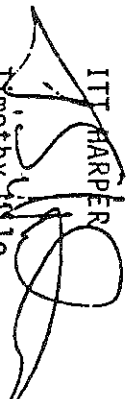
Preliminary projections call for the new cooling system to be installed and ready to operate by September of 1981. The surface impoundment would then become non-operational, awaiting closure. It is Harpers' intent to implement the enclosed closure plans, making the impoundment a closed facility, by November 19, 1981.

Tom confirmed that the enclosed documents fulfilled EPA notification requirements, and that no additional information is necessary at this time.

I expect to meet with Tom early next week to go over the enclosed material. If you have any questions or comments, and if you could make yourself available, it would be a pleasure to have you present at our meeting.

Your prompt consideration of this matter is greatly appreciated.

Sincerely,

ITT HARPER   
Timothy H. Hio  
Plant Engineer

TM/tg  
cc: Valdus Adamkus  
USEPA Regional Administrator  
Tom Golz  
USEPA Waste Mgmt. Branch



ITTE

06/18

ITT Harper 

A Division of  
International Telephone and Telegraph Corporation  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053  
(312) 966-6000 Telex 724-464

June 30, 1981

Mr. Tom Golz  
United States Environmental Protection Agency  
Hazardous Waste Management Division  
111 Jackson Blvd.  
Chicago, Ill.

Dear Tom:

Per our discussion of June 24th, this letter will confirm your review of Harper's closure plans for the surface impoundment, currently used as a storage facility for a recirculating cooling system. As we discussed, Harper's intent is to close the surface impoundment per the submitted closure plan, as a regulated facility. The following additions/modifications to the closure plan and the accompanying Part A permit are in order.

1. The depth of soil contamination will be determined by laboratory analysis, and certified by an independent laboratory. Depth of excavation may vary, dependent on analysis results.
2. Harper's Part A RCRA permit should be modified per the attached sheet. This is due to two reasons:

- a. D000 was used to identify waste streams containing chromium and cadmium in hazardous concentrations. Because of a mis-interpretation of the appropriate numbering system to be used, D000 was shown. It is necessary to show these contaminants as D006 and D007.
- b. F010, F011 and F012 have been eliminated due to revised specifications for hazardous wastes from specific sources. Please note that there has been a small change in the total annual waste volume which also reflects this elimination.

You confirmed that the above changes could be made without going through the De-listing process. I have attached a modified Page 3 of the Part A permit application form for your records. Note that this is signed by myself, and ITT Harper's President, General Manager.

Mr. Tom Colz

June 30, 1981

Page 2

Thank you for the advance word of the various financial requirements soon to be implemented. Our Corporate Legal Staff and Unit Comptroller are now aware of the situation and are discussing our various options.

If there are any further questions or if I can be of any further service, please do not hesitate to contact me directly.

I'm sure we'll be talking again soon.

Sincerely,

ITT HARPER  
Tim Milo  
Plant Engineer

TSM/tg

enclosure

- REVISED CLOSURE SCHEDULE FOR MILL POND -

NOVEMBER 23-25

- Complete liquid removal phase, take samples of soil and sediment on pond bottom.
- Dames & Moore representative to be present during sampling. Tennco Hydro representative to be present during sampling. Photos to be taken.
- If required, the pond will be refilled with city water to a usable level (after sampling is completed.)

NOVEMBER 30-December 4

- Receive results of sample analysis
- if excavation will be required, submit permit authorization application to Illinois EPA.
- Complete all necessary work on tower pumps, motors, etc.
- Complete all necessary work on tower control panel.
- Schedule in Two-W's for excavation (if required) and back-fill.

DECEMBER 7 - 11

- T. Milo in New York for Seminar.
- R. Mack to oversee start of excavation (if required) & backfill.
- Dames and Moore representative to be present.

DECEMBER 14-18

- Complete excavation (if required) take additional samples if required, back fill and grade.
- Seed or sod as required, Dames and Moore representative to be present.

PILL POND SOIL SAMPLING PROCEDURE

Date of Samples - 12/1/81

1. 6 - 3 foot long pieces of 1-1/2" thick wall electrical conduit were prepared. The ends were filed to eliminate burrs and loose shavings. They were then cleaned with water, inside and out, and rinsed with acetone.
2. The conduit was pressed into the underlying soil of the surface impoundment to a depth of approximately one foot.
3. These six core samples of the underlying soil were taken approximately equidistant from each other at points along the circumference of a circle equal in radius to approximately 1/2 the overall pond radius assuming the same approximate center point.
4. The samples (in the conduit) were sealed on both ends, and handed over to a representative of Tenco-Hydro Corp., the independent certified laboratory doing the analyses.
5. A representative of Dames and Moore, the consulting engineering firm acting as the over-seeer of the closure and responsible for signing all documents upon completion of closure, was present.
6. The samples will be analyzed for all heavy metal constituents normally required in the EF Toxicity Procedure, and will be analyzed, per RCRA requirements, by use of the EF Toxicity Procedure.
7. Tenco-Hydro has been instructed to run the EF Toxicity Test on three equal portions of each sample, (i.e. top, middle, and bottom thirds).

*[Handwritten signature]*



⑧ TELEPHONE POLE  
⑨ SAMPLE LOCATION



PUBLIC NOTICE

The United States Environmental Protection Agency (USEPA) announces the receipt of a hazardous waste facility closure plan submitted under the Resource Conservation and Recovery Act (RCRA). IIT-Harper, 8200 Lehigh Avenue, Morton Grove, Illinois, will close a hazardous waste surface impoundment. The plan submitted on May 18, 1981, proposes the excavation and off-site disposal of 5,000 gallons of hazardous waste residues, and an estimated 200 cubic yards of impoundment liner and underlying soils. No hazardous waste will remain upon closure.

The plan is available for public inspection between 10:00 a.m. and 4:00 p.m., Monday - Friday at USEPA Region V Library, 230 South Dearborn, 14th Floor, Chicago, Illinois 60604

Comments on the plan may be submitted to:

U.S. Environmental Protection Agency  
Waste Management Branch  
ATTN: RAIS  
230 South Dearborn  
Chicago, Illinois 60604



DATE: 11 8 AUG 1984

SUBJECT: Attached Proposed Notice-Closure Plan  
ITT Harper, Morton Grove

1L70005211545

FROM: Hak Cho, Chief  
State Technical Unit #1

THRU: Eugene Meyer, Chief  
Technical Programs Section

TO: Judy Kerether, Chief  
Regulatory Analysis Section

The attached public notice advises the public of availability of the closure plan for the above facility, EPA ID# IL0005211545.

The plan proposes to remove a surface impoundment containing spent pickle liquor from steel finishing, EPA hazardous waste No. K062, in its entirety. The plan calls for neutralization and offsite disposal of 5000 gallons of sludge and 200 cubic yards of fines and contaminated soils.

Attachment

SASHMM:TON GOLZ:A.SUTTON:8/18/81:6-7482



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: SEP 10 1981

SUBJECT: Closure Plan - ITT Harper, Morton Grove

FROM: Hak Cho, Chief  
State Technical Unit #1

THRU: Eugene Meyer, Chief  
Technical Programs Section

TO: Judy Kertcher, Chief  
Regulatory Analysis and Information Section

STU#1 has reviewed the closure plan for the above facility. EPA IC# ILD 005 211 545, and found it acceptable. The plan proposes to remove a surface impoundment containing spent pickle liquor from steel finishing. EPA hazardous waste No. K 062, in its entirety. The plan calls for neutralization and off-site disposal of 5,000 gallons of sludge and 200 cubic yards of liner material and contaminated soils.

Because the closure financial assurance requirements are not yet in effect, this planned closure has no RCRA financial responsibility implications.


Attached is a proposed public notice advising the public on the availability of the plan. In that the facility is in the Chicago commuting area, and that the closure should be non-controversial, a single public inspection site ought to be sufficient.

Second inspection site, public library or the facility office can be arranged quickly, if this would be more desirable.

SAHMD:MMB:H.HO:C.MITCHELL:9/9/81



ITT

ITT Harper 

A Division of

International Telephone and Telegraph Corpora

8200 Lehigh Avenue

Morton Grove, Illinois 60053

(312) 966-6000 Telex 724-464

November 13, 1981

Mr. Tom Golz  
United States Environmental  
Protection Agency  
Hazardous Waste Management Div.  
111 Jackson Boulevard  
Chicago, Illinois

Dear Tom:

Per my recent phone conversations with Mr. David Kee, Director Air and Hazardous Materials Division, and yourself, during which we discussed the closure of ITT Harper's surface impoundment, this letter will serve to confirm the following:

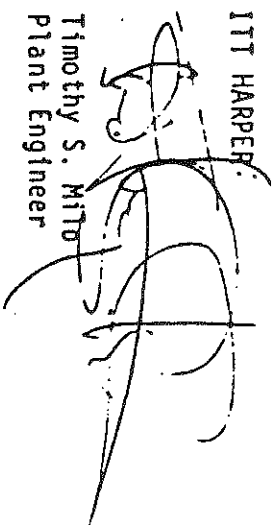
1. Because of the upcoming requirements concerning ground water monitoring facilities for surface impoundments, Harper elected to close its impoundment prior to November 19, 1981.
2. The impoundment was to be replaced by a conventional type cooling tower system.
3. Due to various administrative and installation problems, Harper will be unable to complete the closure of the impoundment prior to November 19, 1981.
4. A request was made, by myself, on behalf of ITT Harper, to Mr. Kee, that USEPA waive the ground water monitoring requirements by extending the previously mentioned November 19, 1981 deadline to December 31, 1981.
5. On November 13, 1981 you informed me that Mr. Kee and yourself had agreed that an extension and waiver as stated above was in the best interests of all concerned parties.
6. As you are now drafting up a letter to ITT Harper indicating approval of the closure plan, you stated that authorization for the December 31, 1981 deadline would be included at the same time. This letter would be signed by Valdas Adamkus, Acting Regional Administrator - Region V - USEPA.

Mr. Tom Golz  
November 13, 1981  
Page Two

I wish to express my appreciation of the prompt consideration given to this matter. As always, we will continue to keep you informed of any pertinent events.

Best regards,

ITT HARPER

A large, stylized handwritten signature in dark ink, appearing to read 'T. MITO', is written over the typed name and title.

Timothy S. MITO  
Plant Engineer

TM/ks



The U.S. Environmental Protection Agency (U.S. EPA) has received a request from ITT Harper to close its surface impoundment at 8200 Lehigh Road, Morton Grove, Illinois. The plan submitted on May 18, 1981, proposes the excavation and off-site disposal of 5000 gallons of spent pickle liquor residues and an estimated 200 cubic yards of impoundment liner and underlying soils. No hazardous waste will remain upon closure.

The ITT Harper request is sought under the rule on Hazardous Waste Management Facility closure (40 CFR 265. Subpart G) which appeared in the Federal Register, January 12, 1981, under the authority of the Resource Conservation and Recovery Act. This application will be evaluated by U.S. EPA according to the criteria set forth in the above rule.

A copy of the plan and related background materials can be seen at the U.S. Environmental Protection Agency, Waste Management Branch, 111 West Jackson, Chicago, Illinois, from 8:30 a.m. to 4:30 p.m., Monday through Friday.

Public comments concerning this application are requested by U.S. EPA, and will be accepted through November 7, 1981. Please send comments to:

U.S. Environmental Protection Agency  
Region V  
RCRA Activities  
P.O. Box A3587  
Chicago, Illinois 60690

00# ILD 005211545



# TENCO LABORATORIES

A DIVISION OF THX, Inc.

6220 EAST AVENUE  
COUNTRYSIDE, ILLINOIS 60025  
PHONE: 312/482-7200

DECEMBER 4, 1981

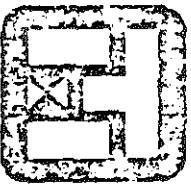
ITT HARPER INC.  
MR. TIM MILOW  
8200 LEHIGH AVE.  
MORTON GROVE, IL 60053

SUBJ: SAMPLES RECEIVED 12/2/81

SIX CORE SAMPLES WERE RECEIVED IN SEALED CONDUIT TUBES (LABELED 1-6). THE SAMPLES WERE REMOVED AND DIVIDED INTO THREE (3) EQUAL PORTIONS (TOP, MIDDLE AND BOTTOM THIRDS OF CORE SAMPLES). EACH PORTION WAS HOMOGENIZED AND A REPRESENTATIVE PORTION TAKEN FOR ANALYSIS.

THE SAMPLES WERE PREPARED FOR ANALYSIS USING THE EP TOXICITY PROCEDURE AND ANALYZED FOR THE HEAVY METAL CONSTITUENTS, PER RCRA REQUIREMENTS.

(PROCEDURE ATTACHED)

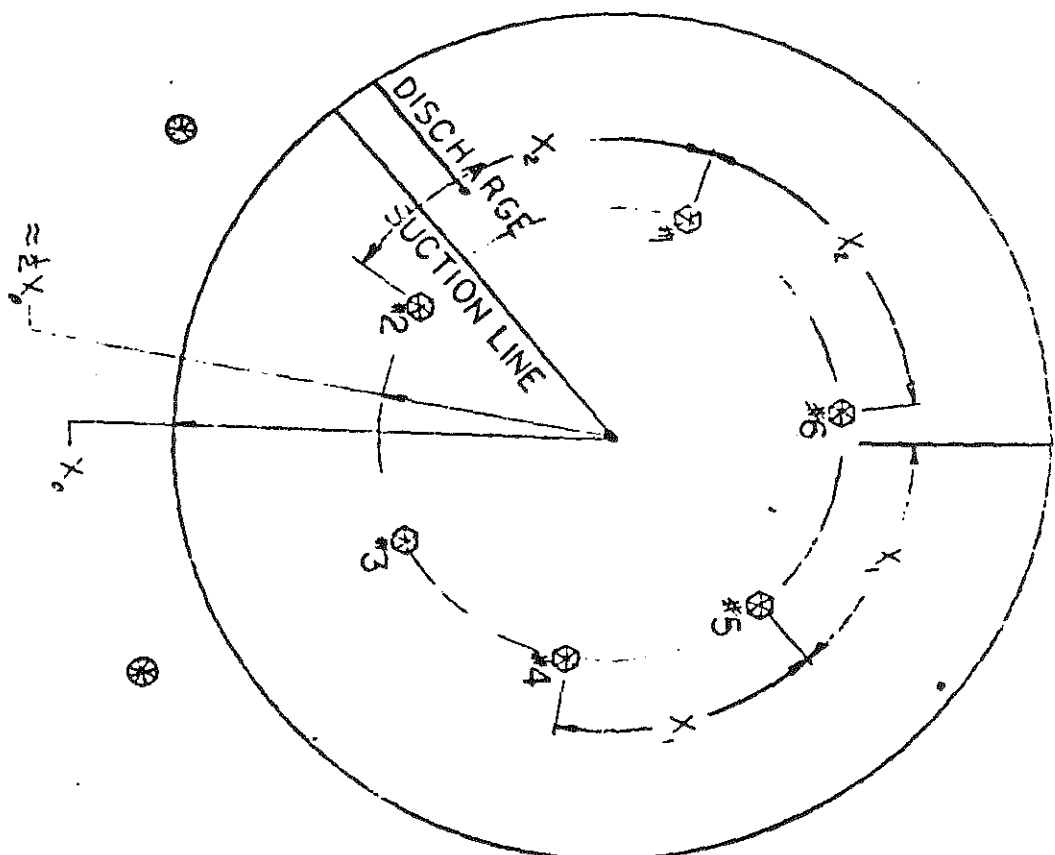


*Tim Milow*

TENCO LABORATORIES  
C. MIKLOSH - ASST.  
(LABORATORY DIR.)

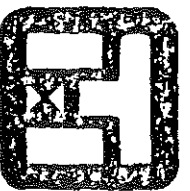
CMJS

ENCL. - SAMPLE RESULTS REPORTS  
PROCEDURE



⊗ TELEPHONE POLE  
⊗ SAMPLE LOCATION

TENCO LAI FACTORIES DIV OF THX  
6020 East Avenue, Channahon, Illinois 60525



Attn: TIM MILLOW

[illegible]

Unless otherwise noted, results in parts per million

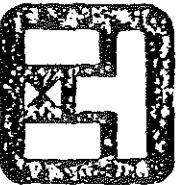
**Certified by:**

Carl F. Dunker

TENCO LABORATORIES DIV OF THX  
5320 East Avenue, Carol Stream, Illinois 60555

$$Pb = 5 \text{ mg/l}$$

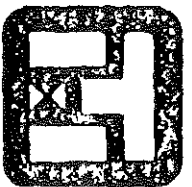
ATTN: TIM MILOW

[illegible]

### Unlabeled Oil: Results in Results for Millions

Certified by: Paul A. Curtis

TENNELA, RICHARD DIV OF THX  
5220 East Avenue Countryside, Illinois 60525



Attn: TIM MILLOW

[illegible]

Unless otherwise noted, results in parts per million.

**Certified by:**

Carl F. Barker

## EP TOXICITY TEST PROCEDURE\*

### A. Extraction Procedure (EP)

1. A representative sample of the waste to be tested (minimum size 100 grams) should be obtained.
2. The sample should be separated into its component liquid and solid phases using the method described in "Separation Procedure" below. If the solid residue obtained using this method totals less than 0.5% of the original weight of the sample, the residue can be discarded and the liquid phase shall be considered the extract. In such a case the operator should proceed immediately to Step 8.
3. The solid material obtained from the Separation Procedure should be evaluated for its' particle size. If the solid material has a surface area per gram of material equal to, or greater than, 3.1 cm<sup>2</sup> or passes through a 9.5mm (0.375 in.) standard sieve, the operator should proceed to Step 4. If the surface area is smaller or the particle size larger than specified above, the solid material should be prepared by crushing, cutting or grinding the material so that it passes through a 9.5 mm (0.375 inch) sieve or if the material is in a single piece, by subjecting the material to the "Structural Integrity Procedure" described below.
4. The solid material in Step 3 should be weighed and placed in an extractor with 16 times its weight of deionized water. Do not allow the material to dry prior to weighing. For purposes of this test, an acceptable extractor is one which will impart sufficient agitation to the mixture to not only prevent stratification of the sample and extraction fluid but also insure that all sample surfaces are continuously brought into contact with well-mixed extraction fluid.

---

\* As outlined in the Federal Register, Vol. 45, No. 98, May 19, 1980  
Part III Identification and Listing of Hazardous Waste

5. After the solid material and deionized water are placed in the extractor, the operator should begin agitation and measure the pH of the solution in the extractor. If the pH is greater than 5.0, the pH should be decreased to  $5.0 \pm 0.2$  by adding 0.5N acetic acid. If the pH is equal to or less than 5.0, no acetic acid should be added. The pH of the solution should be monitored during the course of the extraction and if the pH rises above 5.2, 0.5N acetic acid should be added to bring the pH down to  $5.0 \pm 0.2$ . The mixture should be agitated for 24 hours and maintained at  $20-40^{\circ}\text{C}$  during this time. The pH should be adjusted at 15, 30 and 60 minute intervals, moving to the next longer interval if the pH does not need to be adjusted more than 0.5 pH units. This adjustment procedure should be carried out for at least 6 hours. In no event shall the aggregate amount of acid added to the solution exceed 4 ml. of acid per gram of sample.

If at the end of the 24 hour extraction period, the pH of the solution is not below 5.2 and the maximum amount of acid (4 ml per gram of solids) has not been added, the pH should be adjusted to  $5.0 \pm 0.2$  and the extraction continued for an additional four hours, during which the pH should be adjusted at one hour intervals.

6. At the end of the 24 hour extraction period, deionized water should be added to the extractor in an amount determined by the following equation:

$$V = (20)(W) - (16)(W) - A$$

V=ml. deionized water to be added to the extractor

A=ml. of 0.5N acetic acid added during extraction

W=wt. of solids (grams) added to extractor

7. The material in the extractor should be separated into its solid and liquid phases as described in "Separation Procedure".

8. The liquids resulting from Steps 2 and 7 should be combined. This combined liquid (or the waste itself if it has less than 0.5% solids, as noted in Step 2) is the extract and should be analyzed for the presence of any of the contaminants specified in Table 1, using the analytical procedures designated below.

SEPARATION PROCEDURE

Equipment: A filter holder, designed for filtration media having a nominal pore size of 0.45 micrometers and capable of applying a 5.3 kg/cm<sup>3</sup> (75psi) hydrostatic pressure to the solution being filtered shall be used. For mixtures containing nonabsorptive solids, where separation can be affected without imposing a 5.3 kg/cm<sup>3</sup> pressure differential, vacuum filters employing a 0.45 micrometer filter can be used.

For difficult or slow to filter mixtures, a prefilter bed consisting of the following prefilters in increasing pore size (0.65 micrometer membrane, fine glass fiber prefilter, and coarse glass fiber prefilter) can be used..

After filtration is complete, the solid material should be removed and weighed and then transferred to the extraction apparatus, or, in the case of final filtration prior to analyses, discarded. The material retained on the filter pad should not be allowed to dry prior to weighing. The liquid phase should be stored at 4 °C for subsequent use in Step 8.

B. STRUCTURAL INTEGRITY PROCEDURE

Equipment: A structural integrity tester having a 3.18 cm. (1.25 inch) diameter hammer weighing 0.33 kg. (0.73 lbs.) and having a free fall of 15.24 cm (6 inches) shall be used.

PROCEDURE:

The sample holder should be filled with the material to be tested. If the sample of waste is a large monolithic block, a portion should be cut from the block having the dimensions of a 3.3 c. (1.3 inch) diameter X 7.1 cm.(2.8 inch) cylinder. For a fixated waste, samples may be cast in the form of a 3.3 cm. diameter X 7.1 cm cylinder for purposes of conducting this test. In such cases, the waste may be allowed to cure for 30 days prior to further testing.

The sample holder should be placed in the Structural Integrity Tester, then the hammer should be raised to its maximum height and dropped. This should be repeated fifteen times.

The material should be removed from the sample holder, weighed, and transferred to the extraction apparatus for extraction.

ANALYTICAL PROCEDURES FOR ANALYZING EXTRACT CONTAMINANTS:

- 1). For arsenic, barium, cadmium, chromium, lead mercury, selenium and silver:

"Methods for Analysis of Water And Wastes", Environmental Monitoring and Support Laboratory (EPA-600/4-79-020, March 1979)

- 2). For endrin, lindane, methoxychlor, toxaphene, 2,4-D, 2,4,5-TP(Silvex): "Methods for Benzidine, Chlorinated Organic Compounds, Pentachlorophenol and Pesticides in Water and Wastewater", Environmental Monitoring and Support Laboratory, September 1978.

Table 1

<u>MAXIMUM CONCENTRATION OF CONTAMINANTS FOR CHARACTERISTIC OF EP TOXICITY</u>		
<u>CONTAMINANT</u>	<u>MAXIMUM CONCENTRATION (mg/l)</u>	
Arsenic	5.0	
Barium	100.0	
Cadmium	1.0	
Chromium	5.0	
Lead	5.0	
Mercury	0.2	
Selenium	1.0	
Silver	5.0	
Endrin	0.02	
Lindane	0.4	
Methoxychlor	10.0	
Toxaphene	0.5	
2,4-D	10.0	
2,4,5-TP (Silvex)	1.0	

# TENCO LABORATORIES

A DIVISION OF THX, Inc.

5730 EAST AVENUE  
COUNTRYSIDE, ILLINOIS 60075  
PHONE 312/482-7200

DECEMBER 17, 1981

ITT HARPER INC.  
8200 LEHIGH AVE.  
MORTON GROVE, IL. 60053

ATTN: TIM MILOW

ENCLOSED IS THE REVISED REPORT ON LEAD SAMPLES -- #5 MIDDLE  
(3024) AND #2 MIDDLE (3021). THE ANALYSES WERE RE-RUN AND  
THE VALUES HAVE BEEN CORRECTED AS INDICATED ON THE REVISED  
REPORT, ENCLOSED.



CARL L. ANDREWS  
LABORATORY DIRECTOR

CLA:JS

ENCL.

**TENCO LABORATORIES DIV OF THX**  
5220 East Avenue Countryside, Illinois 60525

REVISED

Report Date: 12/17/81

[illegible]

Unexpectedly, however, as noted results, in part 15 per million

Certified by:

Carl F. Culver



IT&T

ITT Harper ☒

A Division of  
International Telephone and Telegraph Corporat.

3200 Lehigh Avenue

Morton Grove, Illinois 60053

(312) 966-6000 Telex 724464

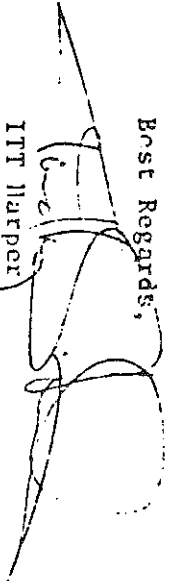
December 23, 1981

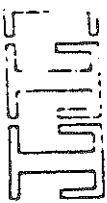
Regional Administrator  
USEPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

Dear Sir:

In accordance with RCRA regulations, ITT Harper is submitting this letter of certification pertaining to the closure of the surface impoundment which was located in the south-east corner of our property. With reference to the attached Certification from Dames and Moore, the Consulting firm retained by Harper to bear witness to the activities of closure, Harper believes the closure was performed in good faith and in accordance with the submitted closure plan.

Best Regards,

  
ITT Harper  
Timothy S. Milo  
Plant Engineer



ITT Harper 

A Division of  
International Telephone and Telegraph Corporation  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053  
(312) 966-6000 Telex 724464

December 23, 1981

Tom Golz  
USEPA Region V  
230 South Dearborn  
Chicago, Illinois 60604

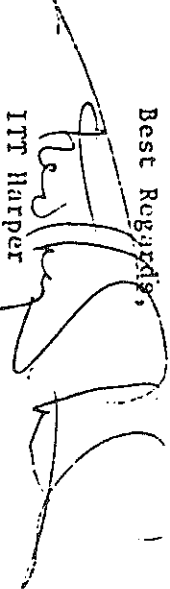
Dear Tom,

Attached is an inspection report and Certification from Pumes and Moore, the Engineering Consulting Firm, retained by ITT Harper, for the purpose of witnessing the closure of Harpers surface impoundment. Please note that due to inclement weather conditions, final site restoration (ie. sodding or seeding) will occur early next spring. This will give the fill a chance to settle prior to final grading.

Also attached is a letter from ITT Harper to the USEPA Regional Administrator certifying the proper closure of the surface impoundment.

I would like to take this opportunity to thank you for all of your help and co-operation in this matter. If there are any questions, or if I may be of any service in the future, please do not hesitate to call me directly.

Best Regards,

  
ITT Harper  
Timothy S. Mello  
Plant Engineer

cc: Regional Administrator

# Dames & Moore



1550 Northwest Highway  
Park Ridge, Illinois 60068  
(312) 297-6120

TWAX: 910-253-4097 Cable address: DAMEMORE

December 22, 1981

ITT Harper  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053

Attention: Mr. Timothy S. Mello  
Plant Engineer

Gentlemen:

Re: Closure Inspection and Certification  
Surface Impoundment

## INTRODUCTION

This letter report formalizes the results of our on-site inspections of portions of the operations associated with closure of the surface impoundment at ITT Harper's Morton Grove plant. The original scope of our services was outlined in our proposal dated October 6, 1981, and authorized under ITT Harper Purchase Order No. (P) 199508 dated November 6, 1981.

The impoundment was part of a recirculating cooling system associated with the rolling mill. The impoundment was located in the southeast corner of the ITT Harper property at 8200 Lehigh Avenue in Morton Grove, IL. We understand that agreement with the U.S. EPA on closure of the impoundment is documented in the attached "CLOSURE PLANS FOR SURFACE IMPOUNDMENT" and subsequent modification described in the June 30, 1981 letter to Mr. Tom Golz of the U.S. EPA, presented as Attachment 1A and 1B. These documents have formed the basis of our inspections and this certification.

## SCOPE OF WORK

The purpose of our services was to observe and provide documentation of major tasks involved in the closure of the impoundment. Specifically, our services were to include:

1. One site visit during initial removal of the liquid phase in the pond;
2. One site visit observing the sampling of sludge in the pond;
3. One site visit observing the removal of sludge and contaminated soils from the pond;

ITT Harper  
December 22, 1981  
Page - 2 -

4. One site visit observing final sampling of the in-situ soil to be left in the pond;
5. One site visit observing the final site grading operations; and
6. Review of pertinent records and test results, and documentation of the results in a written report.

As a result of chemical analyses performed by an independent laboratory that determined the materials in the bottom of the impoundment to be classified as non-hazardous under RCRA, the scope of work performed was somewhat reduced. Items 3 and 4 above were deleted because the closure tasks to be observed were not performed since ITT Harper's interpretation of the closure plan required removal of only the materials classified as hazardous.

#### SUMMARY OF INSPECTIONS

Site visits were conducted on November 19, and November 20, 1981, to observe the pumping systems and operation. Piping systems were examined and pumping observed in progress. An inspection of sampling operations was made on December 3, 1981. Tube samples were taken at six locations shown on Attachment 2, relative to the impoundment perimeter. The samples were collected by pushing tubes to the underlying soil around the periphery of the water, which had been pumped down to form a surface approximately one-half the normal impoundment diameter. Samples were obtained, labeled, and handed over to representatives of Tenco Laboratories Division of THX, who served as ITT Harper's chemistry laboratory subcontractor.

A final site visit was made on December 18, 1981, to observe the commencement of backfilling operations. The liquid in the impoundment had reportedly been pumped to within 1 to 2 feet of the bottom on two occasions; however, the level recovered somewhat upon cessation of pumping. Pumping of the liquid in the impoundment continued during the backfilling operations. Fill material consisted primarily of topsoil stockpiled adjacent to the impoundment. The final grading included mounding over the impoundment to preclude ponding of water subsequent to self-weight settlement of the fill.

ITT Harper  
December 22, 1981  
Page - 3 -

CONCLUSION

In our opinion, the closure of the Impoundment was performed in good faith and in accordance with the interpretation of the referenced closure plan.

Respectfully submitted,

DAMES & MOORE

*by Eric J. ...*  
*Jerry W. H. Wang*

Jerry W. H. Wang, P.E.  
Associate  
Illinois Registration No. 62-34375

*William J. Babcock*  
William J. Babcock, P.E.  
Project Engineer  
Illinois Registration No. 062-039556

JWHW:WJB:jeh

Attachments - Attachment 1A - "CLOSURE PLANS FOR SURFACE  
IMPOUNDMENT"

Attachment 1B - Letter to Tom Goiz

Attachment 2 - Sample Location

Three Copies Submitted

RECEIVED

DEC - 11 1986

PAULPC

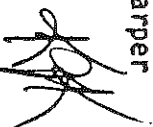


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: January 14, 1982

SUBJECT: Closure Plan Approval, ITT-Harper

FROM: Karl J. Klepitsch Jr., Chief  
Waste Management Branch



TO: B. G. Constantelos, Acting Director  
Waste Management Division

ITT-Harper, Morton Grove, Illinois submitted a closure plan on May 18, 1981, and subsequent modifications on June 30, 1981. A public notice on its availability for inspection was published October 8, 1981. The public comment period closed with no adverse comment 30 days later.

The closure plan describes the excavation and removal of a hazardous waste surface impoundment.

On November 13, 1981, the firm independently contacted David Kee and Thomas Golz, requesting a waiver of the groundwater monitoring requirement which went into effect November 19, 1981. In that the impoundment is out-of-service and removed, I recommend foregoing the groundwater monitoring requirement. The public cannot conceivably benefit from the installation and operation of wells in the area where the impoundment previously existed. Furthermore, analysis of samples of soil taken from below the excavated area indicates the absence of contaminants.



JAN 26 1982

Mr. Timothy Milo  
Plant Engineer  
ITT-Harper  
8200 Lehigh Avenue  
Morton Grove, Illinois 60601

Dear Mr. Milo:

Notice is hereby given that the hazardous waste surface impoundment previously operated by ITT-Harper, 8200 Lehigh Avenue, Morton Grove, Illinois 60053 is considered closed in accordance with 40 CFR 265. This is based on our approval of the closure plan as submitted May 18, 1981, and modified June 30, 1981, and the certifications of closure by Dames & Moore and ITT-Harper.

We have determined that the hazardous waste impoundment has been completely excavated and removed in accordance with the closure plan, and that analysis of soil taken from below the excavated area indicates the absence of contaminants. Accordingly, it will not be necessary for this facility to meet the groundwater monitoring requirements which became effective November 19, 1981.

Please do not hesitate to contact Mr. Thomas B. Golz of my staff, at (312) 886-4023, if you should have any questions regarding this determination.

Sincerely,

Basil G. Constantelos  
Acting Director  
Waste Management Division

bcc: RAIS, Permit File  
Robert L. Stone, SIO



07/01/82  
C

07/14/85 0005 - WORK  
ITT Honeywell  
160 005211545  
AAV

TELETYPE

International Telephone and  
Telegraph Corporation

World Headquarters  
320 Park Avenue  
New York N.Y. 10022  
Telephone (212) 752-6000

July 1, 1982

Mr. Thomas Cavanaugh  
Permit Section Manager  
Division of Land Pollution  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62706

Re: RCRA  
Financial Responsibility Filings for  
Closure and Post-closure Costs

Dear Mr. Cavanaugh:

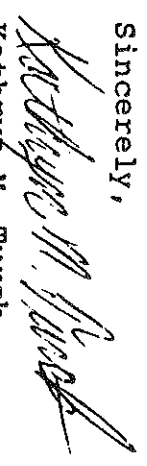
I am enclosing our Chief Financial Officer's letter in support  
of our use of the financial test to meet the above filing require-  
ment for the following facility in your state:

ITT Harper Division      #ILD00521154

In accordance with instructions from Mr. Phillips to make the  
form State specific, we have included a paragraph which refers  
to the Illinois Administration Parts.

I trust you will find this in proper order.

Sincerely,



Kathryn M. Turck  
Assistant Casualty Insurance Manager

Enc.

DATE: 10-21-85

ILD Number 1LD 005211545

03141-1005 - CASH

FACILITY NAME ITT Harper

TYPE OF MEETING:           

Attendance at Meeting:

IEPA

Andy Vollmer

Facility

Lou Rundo

BEN STEWART

Message:

Facility has not been in operation since  
1982 They are going to submit a closure  
plan and formally close.  
They are also going to notify USEPA about  
the possibility of selling the property.

FACILITY TRACKING SHEET

(Subpart H Financial Assurance Review Sheet)

Facility Name: ITT-Harper Div. USEPA ID #: ILD 00521545 IEPA ID #: 0311450005

LDF: \_\_\_\_\_ Non-LDF: X Reviewer: APC 3-18-88  
(Initials) (Date)

Facility in Compliance with Subpart H \_\_\_\_\_  
(Date)

Type of Instruments: \_\_\_\_\_ Liability Coverage? Yes \_\_\_\_\_ No \_\_\_\_\_

CIL Sent \_\_\_\_\_ Response Received \_\_\_\_\_ PECL Sent \_\_\_\_\_ PEC Held \_\_\_\_\_

Referred to EDG \_\_\_\_\_

COMMENTS Facility Certified Closed on per letter of 3-15-88



TTTTT

RECEIVED

AUG 29 1982

ITT Harper 

ILL. E.P.A.-D.L.P.C.  
STATE OF ILLINOIS

August 25, 1982

A Division of  
International Telephone and Telegraph Corpora  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053  
(312) 966-6000 Telex 724464

Mr. Kevin M. Pierard  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
1701 First Avenue  
Maywood, Illinois 60153

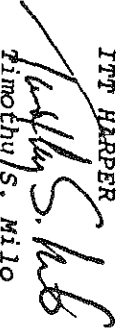
Dear Mr. Pierard:

In response to your request today, I am forwarding this letter to you. As we discussed, Harper empties out the contents of the four 40,000 gallon holding tanks approximately once every 6-12 months. The actual scheduling of the work is highly dependent on business activity. Therefore, I cannot, at this time, furnish you with the actual dates of our next Sludge removal operation. However, I will attempt to inform you as requested, in advance, as to when the tanks will next be empty, so that you may perform an inspection of them. Depending on our business level, this could be anywhere from November 1982 to March of 1983.

If there is any other information you require, or anyway in which I might be of further service, please do not hesitate to call.

Sincerely,

ITT HARPER

  
Timothy S. Milo  
Plant Engineer

TSM/lz





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: September 7, 1982

TO: Division File /

FROM: Kevin Pierard

SUBJECT: Cook County IHD005211545  
Morton Grove/ITT Harper

The subject site surface impoundment was closed and the closure was certified on 12-22-81 by Dames and Moore project engineer William Babcock (IL. registration #062-03-9556). The closure was done in accordance with the attached "closure plan for surface impoundment" submitted by ITT to the USEPA.

On 11-13-81 Mr. Kee and Mr. Golz of the USEPA informed ITT Harper that their request for a waiver of the ground water monitoring requirements from 11-19-81 to 12-31-81 was "in the best interest s of all concerned parties". This allowed the closure of the impoundment before ground water monitoring became a requirement.

Analysis of the materials in the bottom of the impoundment were classified non-hazardous, therefore, none of this soil material was removed. The impoundment was filled with material consisting primarily of top soil. According to the certification letter from Dames and Moore there appears to have been a problem removing the liquid from the impoundment as is outlined in the second paragraph under summary of Inspections (refer to attached letter).

The facility, having closed their impoundment before the expiration of their waiver, is not subject to RCRA part 265 subpart F requirements.

\* There is, however, some question as to whether the lime sludge "tank", indicated on the site map in the northwest corner, is actually a tank or a surface impoundment. Neutralized pickle liquor is pumped into the tank, solids settle to the bottom and liquid is pumped into the MSD sewer system. The sludge which accumulates in the tank is removed approximately every 10 months. The tanks are open top, concrete lined and below grade, making detection of any leakage nearly impossible.

\* At this time we are considering this facility to be a tank, however, future inspection information and/or changes in Illinois Regulations may require that a ground water monitoring system be installed.

We have requested that ITT notify us when the tanks will be pumped dry (letter dated 8-25-82) so that a joint inspection by the Agency and ITT personnel can be made to determine tank integrity.

CC: KMP  
USEPA - Jim Brossman  
Northern Region

Attachment

/sss

RECEIVED

SEP 13 1982

E.P.A. — D.L.C.  
STATE OF ILLINOIS





1761 S. First Street Maywood, IL 60153

312/345-9780

#945

Refer to: 03119505 - Cook County - Morton Grove/ITT Harper

October 22, 1982

Mr. Timothy Milo  
ITT Harper  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053

Mr. Ernie Karlin  
ITT Corporation  
320 Park Avenue  
New York, New York 10022

Dear Mr. Milo:

On August 16, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of ITT Harper Corp., Morton Grove, Ill. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection the following apparent violations were observed:

Pursuant to 35 Ill. Adm. Code 725.116, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. You are in apparent violation of 35 Ill. Adm. Code 725.116 for the following reasons: No records of job training are maintained on site.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to Subpart D of 35 Ill. Adm. Code 725. You are in apparent violation of Subpart D of 35 Ill. Adm. Code 725 for the following reasons: a) Home addresses for emergency coordinator was not listed. b) No evacuation plan had been developed.

Pursuant to 35 Ill. Adm. Code 725.172 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.175 for the following reasons: Items 1 and 2 above had not been developed as required.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Glenn Stenard of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager  
Field Operations Section  
Division of Land Pollution Control

KPB:GJS:prb

Enclosure: Inspection Report


cc: Division File  
Northern Region  
U.S. E.P.A. - Region V



ITTT

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NOV 3 1982  
ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

ITT Harper 

A Division of  
International Telephone and Telegraph Corpora  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053  
(312) 966-6000 Telex 724-464

November 3, 1982

Mr. K. P. Bechely  
Northern Regional Manager  
Field Operations Section  
Division of Land Pollution Control  
Illinois Environmental Protection  
Agency  
1701 South First Street  
Maywood, IL 60153

Dear Mr. Bechely:

In response to your letter of October 22, 1982, which stated the results of an inspection of our facility conducted on August 8, 1982, I am enclosing pertinent documents and information, as required, to confirm our compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, Pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board.

The following comments will help to explain the various attachments.

1) Job Training Records

These records will now be kept as part of our monthly Safety Meeting format. This will allow for the permanent tracking of topics discussed, as well as individuals in attendance. Appropriate revisions to our internal Environmental Control Manual have been made to reflect this procedure.

- \* Attachment #1 - Excerpt from Environmental Control Manual
- \* Attachment #2 - Sample, Safety Meeting Log Sheet
- \* Attachment #3 - Sample, Supervisor's Statement

2) a) Home addresses in contingency plan . . .

Home addresses for all emergency coordinates, primary and secondary, are now listed in the contingency plan section of our internal Environmental Control Manual.

- \* Attachment #4 - Excerpt from Environmental Control Manual

b) Evacuation Plan . . .

A first draft of Harper's evacuation plan has been completed and has been sent to our management for review

Mr. K. P. Bechely  
November 3, 1982  
Page Two

and approval. A copy of the plan will be forwarded to your office upon final approval.

3) Waste tracking . . .

A description and the quantity of each waste, and the method(s) and date(s) of its treatment, storage, or disposal, is now included as part of our facility Environmental Operations Logbook. Further, the locations of these wastes are noted, and a waste manifest log allows cross references to specific manifest numbers, where applicable.

- \* Attachment #5 - Sample, Manifest Log Sheet
- \* Attachment #6 - Sample, Internal Action Log Sheet

In addition to the above attachments, I have also included, per Mr. Sternard's request during the inspection, copies of letters received from our local Police and Fire Departments, acknowledging their receipt of our contingency plan, and other appropriate information. These letters are included as Attachments #7 & #8.

If further clarification on any of these matters is required, please do not hesitate to contact me directly. As always, we will continue to keep you informed of any pertinent events..

Sincerely,



Timothy S. Milo  
Plant Engineer

/ks

Attachments



# ENVIRONMENTAL CONTROL MANUAL

SECTION - III - M

## HAZARDOUS WASTE CONTROLS

ITT Harper  
  
A Division of  
International Telephone  
and Telegraph Corporation

### 3.13 Personnel Training Requirements

#### 3.13.1 General Purpose

All personnel responsible to maintaining ITT Harpers compliance with RCRA regulations will receive the necessary training to perform the job.

#### 3.13.2 Training Program Outline

The training program will consist of the following:

- A. Will be directed by a person trained in and familiar with hazardous waste management procedures.
  - B. Will include hazardous waste management procedures and contingency plan implementation.
  - C. Will ensure that ITT Harpers personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems including the following.
    1. Procedures for inspecting, repairing and replacing facility monitoring equipment and facility emergency equipment.
    2. Communication and alarm systems.
    3. Response to fires and/or explosions.
    4. Shut down operations.
- 3.13.3 The training program will contain any necessary continuing education to include.
- A. New Equipment
  - B. New Procedures
  - C. Review of existing emergency procedures.

3.13.4 The training program will consist of class room instruction, on-the-job training, or a combination of both. Harper's training program will be implemented through the monthly Safety Meetings already being conducted on a regular and formal basis. Topics covered, as well as a 'sign-in' sheet will then become a permanent part of the training program history.

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# Departmental Safety Meeting

Department \_\_\_\_\_ Supervisor \_\_\_\_\_ Date \_\_\_\_\_

Departmental safety meetings shall be conducted each month. These meetings shall be scheduled at the supervisor's discretion.

Date and time of meeting \_\_\_\_\_

Subject of meeting \_\_\_\_\_

Length of meeting \_\_\_\_\_

Names of individuals attending:

- |           |           |
|-----------|-----------|
| 1. _____  | 11. _____ |
| 2. _____  | 12. _____ |
| 3. _____  | 13. _____ |
| 4. _____  | 14. _____ |
| 5. _____  | 15. _____ |
| 6. _____  | 16. _____ |
| 7. _____  | 17. _____ |
| 8. _____  | 18. _____ |
| 9. _____  | 19. _____ |
| 10. _____ | 20. _____ |

Comments: \_\_\_\_\_

\_\_\_\_\_

Supervisor's Signature \_\_\_\_\_

Superintendent Signature \_\_\_\_\_

JOB DESCRIPTION ADDENDUM

HAZARDOUS WASTE INTERFACE ACTIVITIES

NAME: \_\_\_\_\_

JOB TITLE: \_\_\_\_\_

Description of hazardous waste interface activities:

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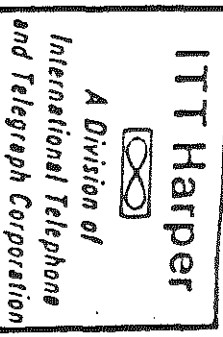
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This employee has received sufficient on-the-job training, and where necessary verbal instructions, to conform with the policies of ITT Harper, as outlined in the Environmental Control Manual.

Foreman's Signature: \_\_\_\_\_ Date: \_\_\_\_\_



# ENVIRONMENTAL CONTROL MANUAL



## SECTION III - K

### HAZARDOUS WASTE CONTROLS

#### 3.11 HAZARDOUS MATERIAL CONTINGENCY PLAN

3.11.1 It is ITT Harper's intent that all EPA identified hazardous wastes be handled and disposed of in accordance with the regulations outlined in the Resource Conservation and Recovery Act.

3.11.2 In the event of a spill of hazardous waste, the following procedure will be immediately implemented.

A. Upon discovery of a hazardous waste spill, the following personnel will be contacted.

1. Day Shift - (7:30 AM to 5:00 PM)

\* T. Milo - Extension 285

\* R. Formosa - Extension 486

\* L. Melton - Extension 448

2. Night Shift - (5:00 PM to 11:30 PM)

\* J. Harlfinger - Extension 349

\* R. Formosa - (Beep through Guard)

3. After Hours and Weekends

\* T. Milo

2017 Dobson

Evanston, IL 60202

Tel. 475-3350

\* R. Formosa

24047 Valley Road

Lake Zurich, IL 60047

Tel. Call Guard to Beep Ron

\* L. Melton

1044 Leawood Dr

Elgin, IL 60120

Tel. 742-8268

B. In the event that the spill presents an imminent danger to employees, the community, or the plant, the Morton Grove Police Department and/or Fire Department will be contacted for assistance.

Revision

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9-15-82

ASL

1 of 2

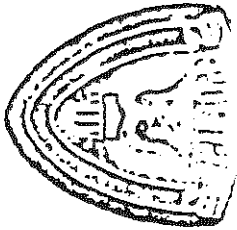


# WASTE INVENTORY FORM

ATTACHMENT #6

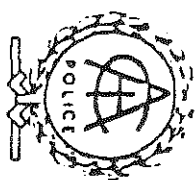
DESCRIPTION OF ACTION &amp; QUANTITY

ATTACHMENT #6 WASTE INVENTORY FORM							
DATE - 1/18/82	DESCRIPTION OF ACTION & QUANTITY	PARTS RINSE SLUDGE (GALLONS)	WASTE OIL (GALLONS)	SLAG (CU. YDS)	METAL HYDROXIDE SLUDGE (GALLONS)	1,1,1, TRICHLOROETH DRUMS	BAGHOUSE DUST (CU. YDS)
7-22	moved 7 111 Drums to Storage					7	
7-27	moved 3 111 Drums to Storage					10	
7-23	waste oil tank on Dock (empty) full		1680				
7-23	SHIPPED OUT 1680 gallons waste oil - 5014R		-6-				
7-11	Pile at casting closed 40 cu yd			~4.0			
7-11	Baghouse Dust Box closed 3/4 full						10
7-11	3 PEG Drums in storage since early 82						



MORTON GROVE POLICE DEPARTMENT

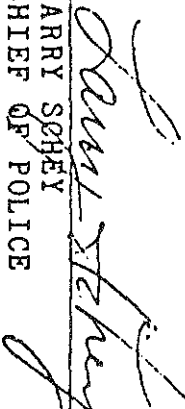
6101 CAPULINA  
MORTON GROVE, ILLINOIS 60053  
Telephone: (312) 470-5208



LARRY SCHEY  
CHIEF OF POLICE

ITT Harper  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053

This will confirm our receipt of ITT Harper's Contingency,  
Preparedness and Prevention policies and plans.

  
\_\_\_\_\_  
LARRY SCHEY  
CHIEF OF POLICE

LS:ab

## Morton Grove Fire Department

6250 LINCOLN AVENUE

MORTON GROVE, ILLINOIS 60053

September 24, 1982

Mr. Tim Milo  
ITT Harper  
8200 Lehigh Av  
Morton Grove, IL 60053

Dear Mr. Milo:

This will confirm our receipt of ITT Harper's Contingency, Preparedness, and Prevention policies and plans, and attached material. We have reviewed these plans and placed them in our permanent Fire Prevention Bureau files for reference.

Sincerely,



Ed Hildebrandt, Lieutenant  
Fire Prevention Bureau

EH:eh



TELETYPE

ITT Harper 

A Division of  
International Telephone and Telegraph Corporat  
8200 Lehigh Avenue  
Morton Grove, Illinois 60053  
(312) 966-6000 Telex 724464

November 18, 1982

RECEIVED

NOV 23 1982

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Mr. Thomas Cavanaugh  
Manager-Permit Section  
Illinois EPA-DLPC  
2200 Churchill Road  
Springfield, Illinois 62706

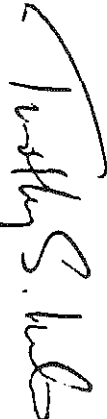
Dear Mr. Cavanaugh:

Per a recent phone conversation with Scott Phillips of your staff, I am enclosing, per RCRA and Illinois regulations, copies of ITT Harper's closure plans and closure cost estimates for all of Harper's hazardous waste facilities. As I discussed with Scott, it is Harper's intent to completely cease all manufacturing operations at its Morton Grove facility. Scott confirmed that the enclosed documents fulfilled EPA notification requirements, and that no further information was required at this time.

It should be noted that Harper has only recently made the decision to shut down operations. Further, it is Harper's desire to complete the shut-down, and all associated hazardous waste facility closures in as orderly and expedient a fashion as possible, with the final goal of satisfying EPA requirements and having Harper's interim status withdrawn. If there are any further questions, please feel free to contact me directly. Otherwise, I will continue to keep in close contact with Scott, and representatives from your Maywood, Illinois office.

Your prompt consideration of this matter is greatly appreciated.

Sincerely,

  
Timothy S. Willo  
Plant Engineer

TSM/jg  
Encl.

cc: Glenn Stenard - Maywood, IL  
Kenneth Bechely - Maywood, IL  
Scott Phillips - Springfield, IL



# ENVIRONMENTAL CONTROL MANUAL

SECTION III - 0

## HAZARDOUS WASTE CONTROLS



ITT Harper  
A Division of  
International Telephone  
and Telegraph Corporation

### I. Closure Plans for Tanks

Upon receipt of written approval from EPA, the tank will be closed, adhering to the following plan.

- A. All standing liquid will be removed by pumping into Harper's industrial treatment system. The Q.C. Department will be notified so additional analyses of treated effluent can be made.
  - B. If, in the opinion of the Q.C. Department, Harper's industrial treatment system cannot effectively treat the waste liquid, it will be neutralized in the tank and services arranged for the proper hauling and disposal of liquid sludge.
  - C. In the event that it is one of the tanks essential to the Harper industrial treatment system, which is being closed, step B will apply.
  - D. The tank will be disposed of by:
    1. Decontamination and disposal at an off-site disposal facility.
- OR-
1. Decontaminated on site for:
    - a. salvage
    - b. converted to other uses
  - E. All hazardous waste generated as a result of a tank closure will be properly hauled and disposed of, observing all requirements of the Illinois & USEPA manifest system.


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# ENVIRONMENTAL CONTROL MANUAL


SECTION III - 0

## HAZARDOUS WASTE CONTROLS

ITT Harper  
  
A Division of  
International Telephone  
and Telegraph Corporation


### II. Closure Plans for Harper's Industrial Waste Sewer System

- A. All liquid will be removed and neutralized. Sludge and neutralized liquid will be hauled and disposed of properly.
- B. All sewer lines, manholes, valves, etc. will be flushed with water in a manner which will render the rinse-water non-hazardous.
- C. This rinse water will be subject to the process as in step A above.
- D. All hazardous wastes generated or accumulated as a result of this closure, will be properly hauled and disposed of, observing all requirements of the Illinois & USEPA manifest system.

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# ENVIRONMENTAL CONTROL MANUAL

ITT Harper  
  
A Division of  
International Telephone  
and Telegraph Corporation

SECTION III - 0

## HAZARDOUS WASTE CONTROLS

### III. Closure Plans for the Casting Area Baghouse

- A. All baghouse bags will be removed and will be disposed of as hazardous waste.
- B. All waste will be removed from the interior of the baghouse and disposed of as hazardous waste.
- C. If necessary, the walls, floors, ceiling of the interior of the baghouses will be scraped or sand blasted, as required, to remove any hazardous waste residues.
- D. All waste removed from the baghouses will be properly hauled and disposed of, observing all requirements of the Illinois and USEPA manifest system.

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# ENVIRONMENTAL CONTROL MANUAL

ITT Harper  
  
A Division of  
International Telephone  
and Telegraph Corporation

SECTION III - 0

## HAZARDOUS WASTE CONTROLS

### IV. Closure Plan for 1,1,1 - Trichoreothane Storage Area

- A. All degreasers will be emptied of waste material. This material will be placed in properly marked drums.
- B. All drums containing this waste material will be properly hauled and disposed of, observing all requirements of the Illinois and USEPA manifest system.
- C. Any contaminated, but empty drums, will be hauled and disposed of as hazardous waste.

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OK



# ENVIRONMENTAL CONTROL MANUAL

ITT Harper  
A Division of  
International Telephone  
and Telegraph Corporation

SECTION III - P

## HAZARDOUS WASTE CONTROLS

### I. Closure Cost Estimate for Holding Tanks.

#### A. Disposal of standing liquid & sludge

1. Labor (Maint. & Q.C.) = **n** hrs @ **nonre**/hr. **nonres**  
2. Sludge & liquid disposal = **nonres** gallons **nonresp**  
X \$.**no**/gallon

#### B. Decontamination costs

1. Maintenance & Q.C. labor = **n** hours **nonres**  
X **nonres**/hour  
2. Sludge and liquid disposal costs = **nonre** **nonresp**  
gallons X \$.**no**/gallon

#### C. Contingencies

**\$nonresp**

### II. Closure cost estimate for Lime Neutralization Bldg.

#### A. Disposal of standing liquid & sludge

1. Labor (Maint. & Q.C.) = **n** hrs @ **n**/hr. **nonres**  
2. Sludge & liquid control = **nonre** gallon **nonresp**  
X \$.**no**/gallon

#### B. Decontamination costs

1. Maintenance & Q.C. labor = **n** hrs. **nonres**  
X \$.**nonrD**/hr.  
2. Sludge and liquid disposal costs = **nonr** **nonresp**  
gallons X \$.**no**/gallon

#### C. Contingencies

**nonresp**

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# ENVIRONMENTAL CONTROL MANUAL

ITT Harper  
  
A Division of  
International Telephone  
and Telegraph Corporation

## SECTION III - P HAZARDOUS WASTE CONTROLS

### III. Closure Costs Estimate for Industrial Sewer System

#### A. Disposal of liquid & decantamination

1. Contractor services for triple rinse with  
jetting equipment = \$nonres/day X n days
2. Neutralizing agents
3. Sludge & liquid disposal nonres gallons  
X \$no/gallon

nonres  
nonre  
nonres

#### B. Contingencies

nonres  
nonres  
nonres

### IV. Closure Cost Estimated for Baghouse

#### A. Disposal of excess waste

1. Maintenance labor to remove = n hours  
X \$nonr/hour
2. Transportation & disposal costs = approx.  
non yards3 + n yds.3/load X nonres/load

nonres  
nonres  
nonres

#### B. Sand Blast/Cleaning of contaminate portions

1. Maintenance & labor no hrs. x \$nonr/hr
2. Transportation & disposal cost  
Best guess estimate

nonres  
nonres  
nonres

#### C. Contingencies

nonres  
nonres  
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## SECTION III - P

### HAZARDOUS WASTE CONTROLS

#### V. Closure Cost Estimated for 1,1,1,-Trichloroethane

##### A. Disposal of maximum number of drums

1. Harper is currently sending this waste to be recycled. Minimum credit for this waste would occur if no waste was available. (n )

##### B. Disposal of contaminated but empty drums

1. Transportation and disposal - maximum of no drums X \$none/drum nonres
2. Maintenance and labor = n hours X \$none/hr. nonr

##### C. Contingencies

nonres

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